MORROW, MORROW, RYAN AND BASSETT

ATTORNEYS AT LAW
POST OFFICE DRAWER 1787
OPELOUSAS, LOUISIANA 70571-1787

PATRICK C. MORROW
J. MICHAEL MORROW (1946-1983)
JAMES P. RYAN
JEFFREY M. BASSETT
P. CRAIG MORROW
CANDYCE C. GAGNARD
RICHARD T. HAIK, JR.

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TOLL FREE: 1-800-356-6776
FAX: (337) 942-5234

May 19, 2009

Via fax to: 214-665-2146

Leticia Lane
EPA Region 6

Re: Colfax Creosoting Company - Pineville, LA
RIN: 06-RIN-00279-09

Dear Ms. Lane:

In response to our initial request for the 81 photographs we requested, Ms. Kathy Laws indicated she found additional photographs from 1989 and 1991.

I would like to make an additional FOIA request to include all of the photos in the file, including the 1989 and 1991 photographs mentioned by Kathy Laws. I would like color copies of all photographs.

Please advise of the cost and I will promptly remit same. Thank you.

Sincerely yours,

Morrow, Morrow, Ryan & Bassett

William St. Cyr

11/3/83

RCRA INSPECTION

I. SITE IDENTIFICATION

LAD008184616

A. Site Name — B. Street (or other identifier)

Colfax Creosoting Company — Po Box 231 Wadley Road

C. City — D. State — E. Zip Code — F. County Name

Pineville — LA — 71360

G. Site Operator Information

1. Name — 2. Telephone Number

Roy O. Martin Lumber Company — 318-442-2467

3. Street — 4. City — 5. State — 6. Zip Code

Po Box 1110 — Alexandria — LA — 71301

H. Site Description

Pole treating - surface impoundment

I. Latitude (deg.-min.-sec.) 31° 19' 00" — Longitude (deg.-min.-sec.) 92° 26' 00"

J. Type of Ownership

___1. Federal ___2. State ___3. County ___4. Municipal X 5. Private

K. X 1. Generator ___2. Transporter ___3. Treatment X 4. Storage ___5. Disposal

INSPECTION INFORMATION

A. Principal Inspector Information

1. Name — 2. Title

Tom Patterson — Env. Protection Specialist

3. Organization — 4. Telephone No. (area code & No.)

LA DNR — 504-342-1227

B. Inspection Participants

Holly Anderson - EPA

Clyde Norton - Colfax

Carl Johnson - Colfax

John Ball - Engineering Consultant to Colfax

Section C - Manifest

1. Does generator ship hazardous waste off-site? (Subpart B - The Manifest) ___ Yes ✓ No

   a. If no, do not fill out Section C and D.

   b. If yes, identify primary off-site facility(s). Use narrative explanations sheet.)

2. Has generator shipped hazardous waste off-site since November 19, 1980? ___ Yes ___ No

3. Is generator exempted from regulation because of:

   Small quantity generator (261.5 - Special requirements) ___ Yes ___ No

   OR

   Produces non-hazardous waste at this time (261.4 - Exclusions) ___ Yes ___ No

4. If not exempted does generator use manifest? (262.20 - General requirements) ___ Yes ___ No

   a. If yes, does manifest include the following information (262.21 - Required information) (Break up items or circle ones not on manifest)

      1. Manifest Document No. ___ Yes ___ No

      2. Generators Name, Mailing Address, Tele. No. ___ Yes ___ No

      3. Generator EPA I.D. No. ___ Yes ___ No

      4. Transporter(s) Name and EPA I.D. No. ___ Yes ___ No

      5. a. Facility Name, Address and EPA I.D. No. ___ Yes ___ No

      6. DOT description of the waste ___ Yes ___ No

      7. a. Quantity (weight or volume) ___ Yes ___ No
         b. Containers (type and number) ___ Yes ___ No

      8. Emergency Information (optional) (special handling instructions, Phone No.) ___ Yes ___ No

N/A

Revised 7/82

RCRA COMPLIANCE INSPECTION REPORT
GENERATORS CHECKLIST

Note: On multiple part questions, circle those not in compliance.

Section A - EPA Identification No.

1. Does Generator have EPA I.D. No.? (262.12 - EPA I.D. No.) ✓ Yes ___ No

   a. If yes, EPA I.D. No. LAD008184616

Section B - Hazardous Waste Determination

1. Does generator generate hazardous waste(s) listed in Subpart D (261.30 - 261.33 - List of Hazardous Waste)? ✓ Yes ___ No

   a. If yes, list wastes and quantities ~~on attachment~~ (Include EPA Hazardous Waste No.) (Provide waste name and description.) K001 - Bottom sediment sludge from the treatment of wastewaters from wood preserving with creosote or pentachlorophenol (T)

2. Does generator generate solid waste(s) that exhibit hazardous characteristics? (corrosovity, ignitability, reactivity, EP toxicity) (261.20 - 261.24 - Characteristics of Hazardous waste.)

   ___ Yes ✓ No

   a. If yes, list wastes and quantities on attachment. (Include EPA Hazardous Waste No.) (Provide waste name and description) N/A

   b. Does generator determine characteristics by testing or by applying knowledge of processes? _____

      1. If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)? ___ Yes ___ No

      2. If equivalent test methods used, attach copy of equivalent methods used.

3. Are there any other solid wastes deemed non-hazardous generated by generators? i.e.(process waste streams, collected matter from air pollution control equipment, water treatment sludge, etc.)

   ___ Yes ✓ No

   a. If yes, did generator determine non-hazardous characteristics by testing or knowledge of process? _____ N/A

      1. If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)? ___ Yes ___ No

      2. If equivalent test methods used, attach copy of equivalent methods used.

   b. List wastes and quantities deemed non-hazardous or processes from which non-hazardous wastes were produced. (Use narrative explanations sheet.)

N/A

9. Is the following certification on each manifest form? ____ Yes ____ No

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

5. Does generator retain copies of manifests? ____ Yes ____ No

(Check completed manifests at random. Indicate how many manifests were inspected, how many violations were noted and the type of violation.)

If yes, complete a through e. If questions contain more than one item, circle those not in compliance. (263.23 Use of the Manifest)

a. (1) Did generator sign and date all manifests inspected? ____ Yes ____ No
(2) Who signed for generator? Name _____ Title _____

b. (1) Did generator obtain handwritten signature and date of acceptance from initial transporter? ____ Yes ____ No
(2) Who signed and dated for transporter? Name _____ Title _____

c. Does generator retain one copy of manifest signed by generator and transporter? ____ Yes ____ No

d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? ____ Yes ____ No

e. If copy of manifest from facility was not returned within 45 days, did generator file an exception report? (262.42 - Exception reporting) ____ Yes ____ No

(1) If yes, did it contain the following information

Legible copy of manifest ____ Yes ____ No
AND
Cover letter explaining generators efforts to locate waste. ____ Yes ____ No

f. Does (will) generator retain copies for 3 years? ____ Yes ____ No

Section D - Pre-Transport Requirements

1. Does generator package waste? ____ Yes ✓ No

   If no, skip the rest of Section D.
   If yes, complete the following questions.

N/A

2. Does generator package waste in accordance with 49 CFR 173 178, and 179? (DOT requirements) (262.30 - Packaging) ____ Yes ____ No

3. Inspect containers to be shipped.
   a. Are containers to be shipped leaking or corroding or bulging? ____ Yes ____ No
   b. Use narrative explanations sheet to describe containers and condition.
   c. Is there evidence of heat generation from incompatible wastes in the containers? ____ Yes ____ No

4. Does the generator use DOT labeling requirements in accordance with 49 CFR 172? (262.31 - Labeling) ____ Yes ____ No

5. Does the generator mark each package in accordance with 49 CFR 172? (262.32 - Marking) ____ Yes ____ No

6. Is each container of 110 gallons or less marked with the following label? (262.32 - Marking) ____ Yes ____ No

   Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

   Generator's Name and Address _____

   _____

   Manifest Document Number _____

N/A

7. If there are any vehicles present on site loading or unloading hazardous waste, inspect for presence of placards. Note this instance on narrative explanation sheet.

N/A

8. Accumulation Time (262.34 - Accumulation Time)
   a. Is facility a permitted storage facility? ____ Yes ____ No

   If yes, skip to question #9.
   If no, answer rest of question #8.

   b. Is hazardous waste shipped offsite within 90 days? ____ Yes ____ No

   c. Are containers used to store waste? ____ Yes ____ No

      (1) Is the beginning date of accumulation time clearly indicated? ____ Yes ____ No

N/A

c. (1) Does generator inspect containers for leakage or corrosion? (265.174 - Inspections) ___ Yes ___ No

(2) If yes, with what frequency? _____

d. (1) Does generator handle ignitable or reactive waste? ___ Yes ___ No

(2) If yes, does generator locate containers holding ignitable or reactive waste at least 15 meters (50 feet) inside facility's property line? (265.176 - Special Requirements for Ignitable or Reactive Wastes) ___ Yes ___ No

NOTE: If generator accumulates waste on-site for less than 90 days, fill out Facilities Checklist Section A—#9 Personnel Training; Section B - Preparedness and Prevention; and Section C - Contingency Plan and Emergency Procedures.

9. Describe storage area. Use photos and narrative explanation sheet.

Section E - Recordkeeping and Records

1. Is generator keeping the following reports? (262.40 - Recordkeeping) (Note: The following must be kept for a minimum of three (3) years.)

N/A

a. Manifests and signed copies from designated facilities? ___ Yes ___ No
b. Annual reports (Not applicable until March 1982) ✓ Yes ___ No
c. Exception Reports ___ Yes ___ No N/A
d. Test results where applicable. ✓ Yes ___ No

2. Where are records kept (at facility or elsewhere)? at facility

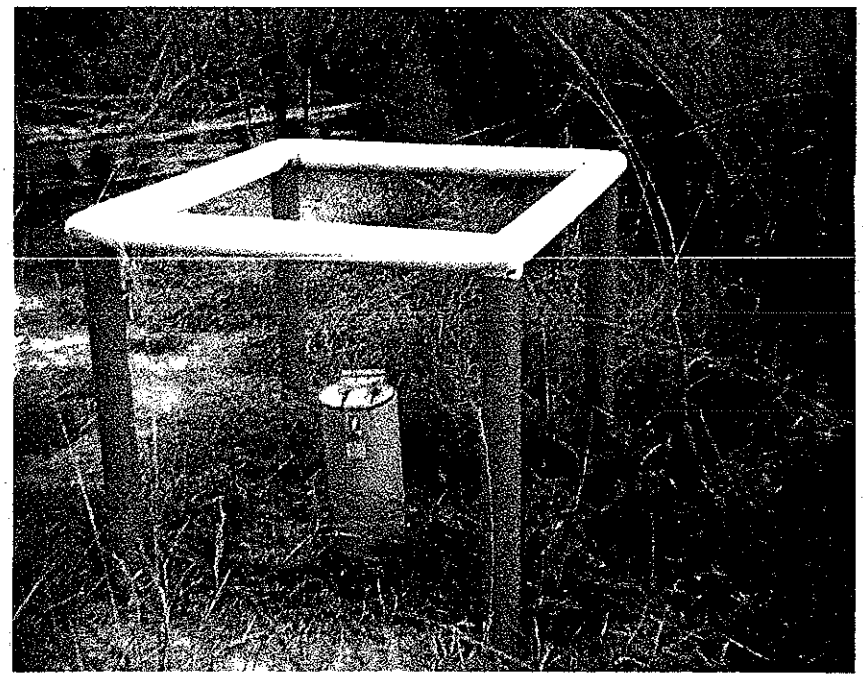
3. Who is in charge of keeping the records? Name Clyde Norton Title Vice President

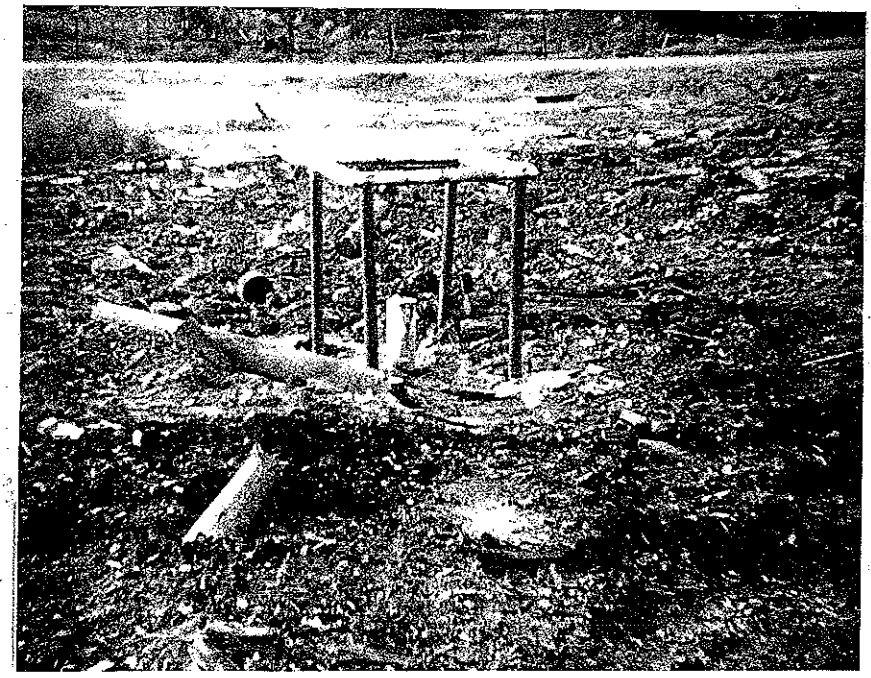
Section F - Special Condition

1. Has generator received from or transported to a foreign source any hazardous waste? (262.50 - International Shipments) ___ Yes ✓ No

If yes, N/A

a. Has he filed a notice with the R.A.? ___ Yes ___ No
b. Is this waste manifested and signed by Foreign Consignee? ___ Yes ___ No
c. If generator transported wastes out of the country has he received confirmation of delivered shipment? ___ Yes ___ No





OFFICIAL PHOTOGRAPH

U.S. ENVIRONMENTAL PROTECTION AGENCY

****

SUBJECT: Monitoring Well #1

LOCATION: COLFAX Creosoting
LAD008184616

CITY: Pineville COUNTY: — STATE: LA

DATE: 11/14/83 TIME: afternoon

WEATHER: [SUN] [HAZE] [CLOUDY] [RAIN] [SNOW]

PHOTOGRAPHER (Sig.) Holly Anderson

WITNESS: Tom Patterson - DNR

CAMERA: Kodak 110

FILM TYPE: ASA: T:1/ f:

NEGATIVE LOCATION: FILE #:

PROCESSED BY:

PHOTO #: 1 of 15

OFFICIAL PHOTOGRAPH

U.S. ENVIRONMENTAL PROTECTION AGENCY

****

SUBJECT: Monitoring well #2

LOCATION: COLFAX CREOSOTING
LAD008184616

CITY: Pineville COUNTY: — STATE: LA

DATE: 11/14/83 TIME: afternoon

WEATHER: [SUN] [HAZE] [CLOUDY] [RAIN] [SNOW]

PHOTOGRAPHER (Sig.) Holly Anderson

WITNESS: Tom Patterson - DNR

CAMERA: Kodak 110

FILM TYPE: ASA: T:1/ f:

NEGATIVE LOCATION: FILE #:

PROCESSED BY:

PHOTO #: 2 of 15

OFFICIAL PHOTOGRAPH

U.S. ENVIRONMENTAL PROTECTION AGENCY

****

SUBJECT: monitoring well #3

LOCATION: COLFAX Creosoting
LAD008184616

CITY: Pineville COUNTY: — STATE: LA

DATE: 11/14/83 TIME: afternoon

WEATHER: [SUN] [HAZE] [CLOUDY] [RAIN] [SNOW]

PHOTOGRAPHER (Sig.) Holly Anderson

WITNESS: Tom Patterson - DNR

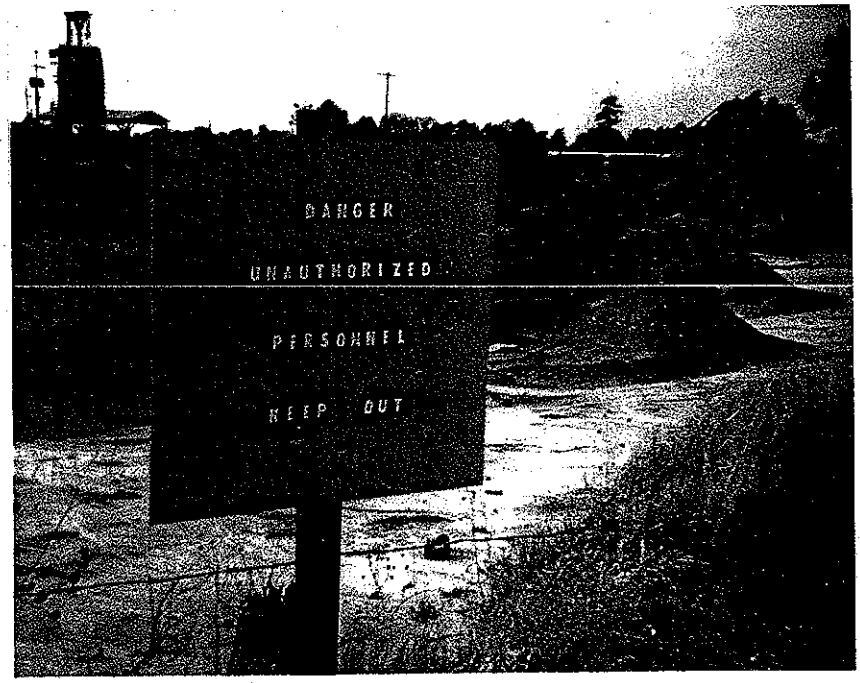
CAMERA: Kodak 110

FILM TYPE: ASA: T:1/ f:

NEGATIVE LOCATION: FILE #:

PROCESSED BY:

PHOTO #: 3 of 15


DANGER
UNAUTHORIZED
PERSONNEL
KEEP OUT

OFFICIAL PHOTOGRAPH

U.S. ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: monitoring well #3 close up

LOCATION: COLFAX CREOSOTING LA D008184616

CITY: Pineville COUNTY: — STATE: LA

DATE: 11/14/83 TIME: afternoon

WEATHER: (SUN) [HAZE] [CLOUDY] [RAIN] [SNOW]

PHOTOGRAPHER (Sig.) Holly Anderson

WITNESS: Tom Patterson - DNR

CAMERA: Kodak 110

FILM TYPE: ASA: T:1/ f:

NEGATIVE LOCATION: FILE #:

PROCESSED BY:

PHOTO #: 4 of 15

OFFICIAL PHOTOGRAPH

U.S. ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: Sign at impoundment

LOCATION: COLFAX CREOSOTING LA D008184616

CITY: Pineville COUNTY: — STATE: LA

DATE: 11/14/83 TIME: afternoon

WEATHER: (SUN) [HAZE] [CLOUDY] [RAIN] [SNOW]

PHOTOGRAPHER (Sig.) Holly Anderson

WITNESS: Tom Patterson - DNR

CAMERA: Kodak 110

FILM TYPE: ASA: T:1/ f:

NEGATIVE LOCATION: FILE #:

PROCESSED BY:

PHOTO #: 5 of 15

OFFICIAL PHOTOGRAPH

U.S. ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: impoundment

LOCATION: COLFAX CREOSOTING LA D008184616

CITY: Pineville COUNTY: — STATE: LA

DATE: 11/14/83 TIME: afternoon

WEATHER: (SUN) [HAZE] [CLOUDY] [RAIN] [SNOW]

PHOTOGRAPHER (Sig.) Holly Anderson

WITNESS: Tom Patterson - DNR

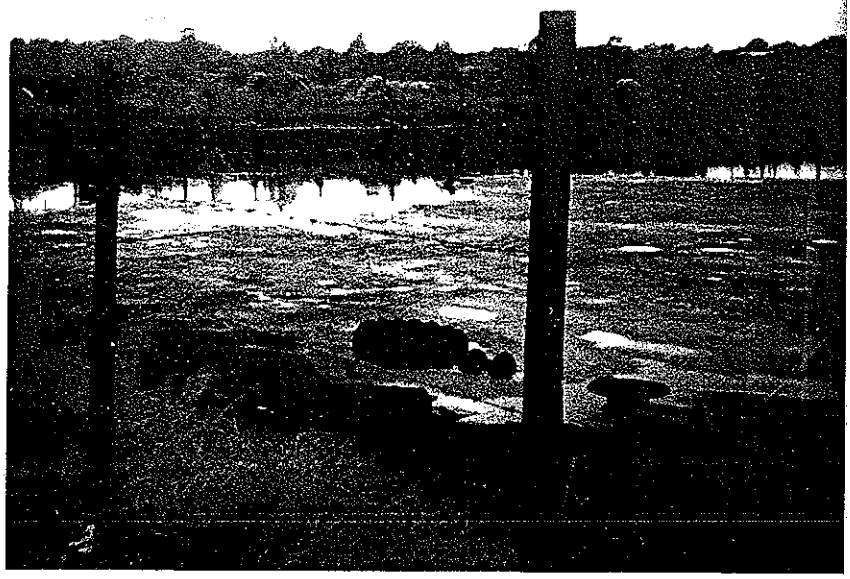
CAMERA: Kodak 110

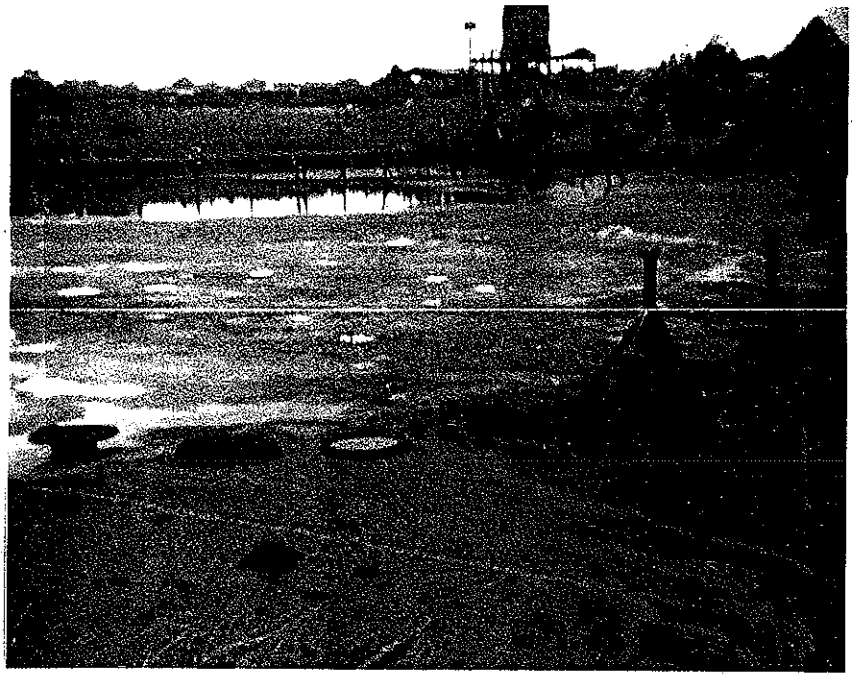
FILM TYPE: ASA: T:1/ f:

NEGATIVE LOCATION: FILE #:

PROCESSED BY:

PHOTO #: 6 of 15





OFFICIAL PHOTOGRAPH
U.S. ENVIRONMENTAL PROTECTION AGENCY
****

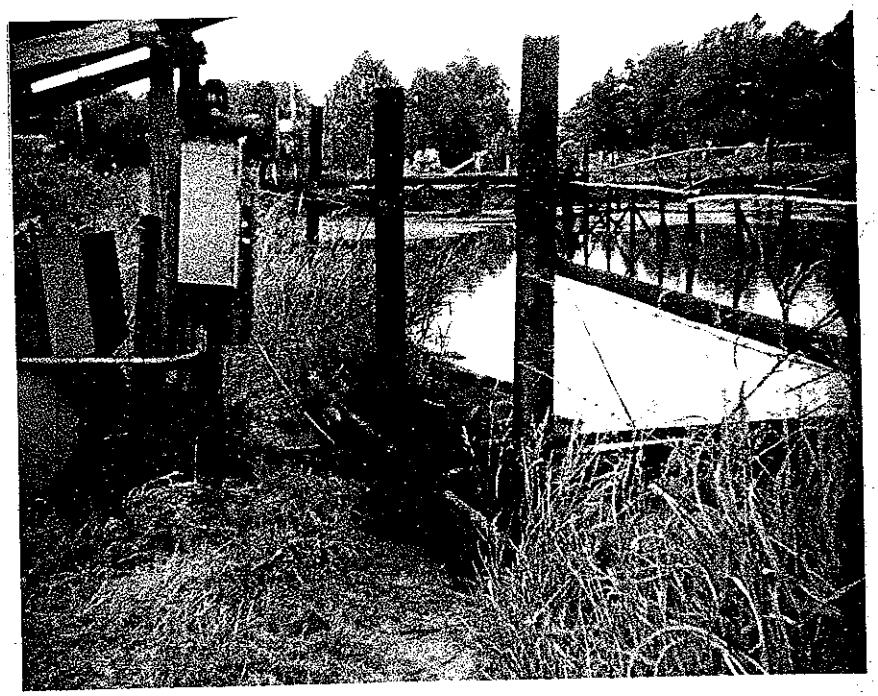
SUBJECT: impoundment
LOCATION: COLFAX CREOSOTING
LAD008184616
CITY: Pineville COUNTY: — STATE: LA
DATE: 11/14/83 TIME: afternoon
WEATHER: (SUN) [HAZE] [CLOUDY] [RAIN] [SNOW]
PHOTOGRAPHER (Sig.) Holly Anderson
WITNESS: Tom Patterson - DNR
CAMERA: Kodak 110
FILM TYPE: ASA: T:1/ f:
NEGATIVE LOCATION: FILE #:
PROCESSED BY:
PHOTO #: 7 of 15

OFFICIAL PHOTOGRAPH
U.S. ENVIRONMENTAL PROTECTION AGENCY
****

SUBJECT: impoundment
LOCATION: COLFAX CREOSOTING
LAD008184616
CITY: Pineville COUNTY: — STATE: LA
DATE: 11/14/83 TIME: afternoon
WEATHER: (SUN) [HAZE] [CLOUDY] [RAIN] [SNOW]
PHOTOGRAPHER (Sig.) Holly Anderson
WITNESS: Tom Patterson DNR
CAMERA: Kodak 110
FILM TYPE: ASA: T:1/ f:
NEGATIVE LOCATION: FILE #:
PROCESSED BY:
PHOTO #: 8 of 15

OFFICIAL PHOTOGRAPH
U.S. ENVIRONMENTAL PROTECTION AGENCY
****

SUBJECT: impoundment
LOCATION: COLFAX CREOSOTING
LAD008184616
CITY: Pineville COUNTY: — STATE: LA
DATE: 11/14/83 TIME: afternoon
WEATHER: (SUN) [HAZE] [CLOUDY] [RAIN] [SNOW]
PHOTOGRAPHER (Sig.) Holly Anderson
WITNESS: Tom Patterson - DNR
CAMERA: Kodak 110
FILM TYPE: ASA: T:1/ f:
NEGATIVE LOCATION: FILE #:
PROCESSED BY:
PHOTO #: 9 of 15



OFFICIAL PHOTOGRAPH
U.S. ENVIRONMENTAL PROTECTION AGENCY

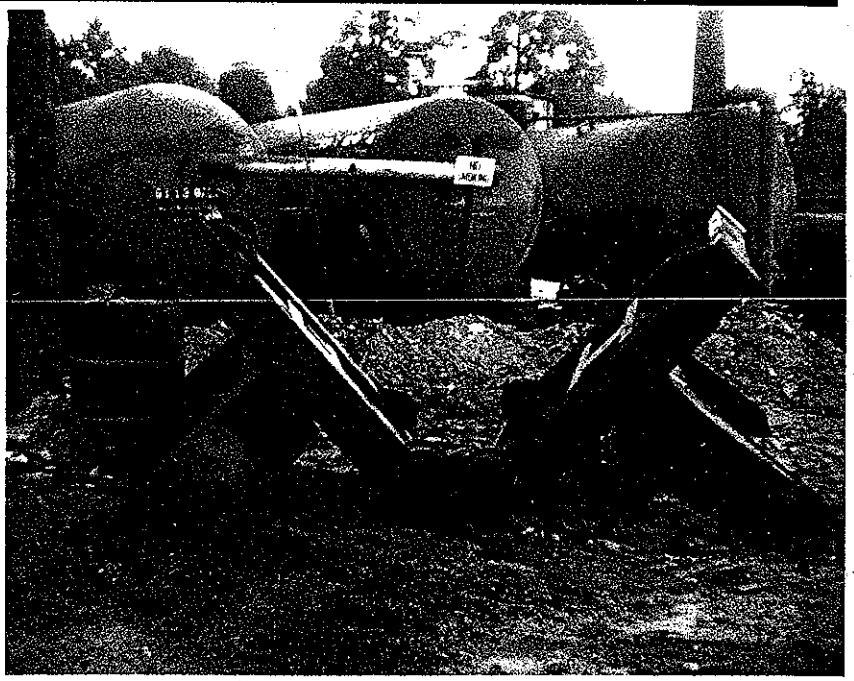
SUBJECT: impoundment - dike
LOCATION: COLFAX CREOSOTING
LAD008184616
CITY: Pineville COUNTY: — STATE: LA
DATE: 11/14/83 TIME: afternoon
WEATHER: (SUN) [HAZE] [CLOUDY] [RAIN] [SNOW]
PHOTOGRAPHER (Sig.) Holly Anderson
WITNESS: Tom Patterson - DNR
CAMERA: Kodak 110
FILM TYPE: ASA: T:1/ f:
NEGATIVE LOCATION: FILE #:
PROCESSED BY:
PHOTO #: 10 of 15

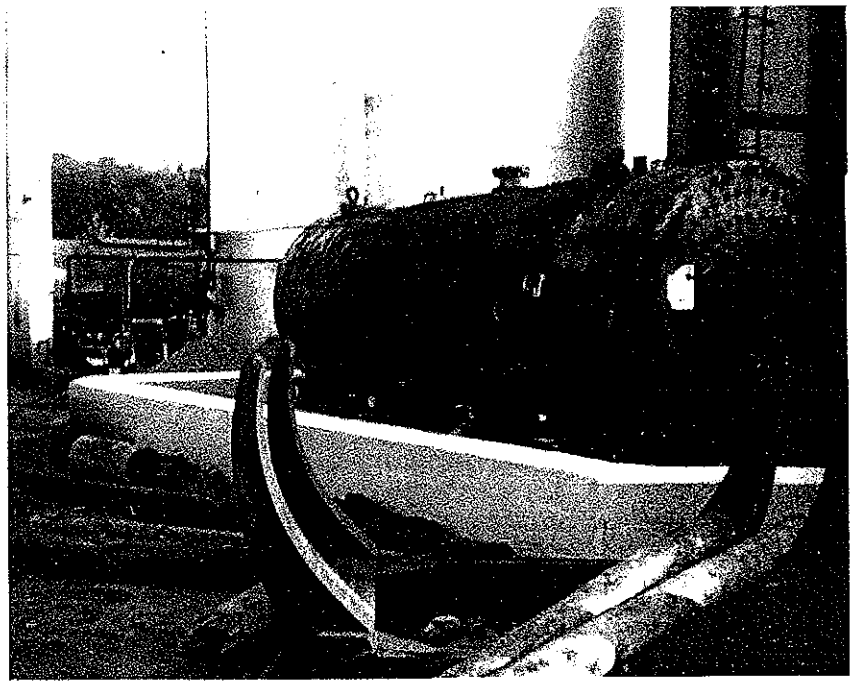
OFFICIAL PHOTOGRAPH
U.S. ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: impoundment - dike
LOCATION: COLFAX CREOSOTING
LAD008184616
CITY: Pineville COUNTY: — STATE: LA
DATE: 11/14/83 TIME: afternoon
WEATHER: (SUN) [HAZE] [CLOUDY] [RAIN] [SNOW]
PHOTOGRAPHER (Sig.) Holly Anderson
WITNESS: Tom Patterson - DNR
CAMERA: Kodak 110
FILM TYPE: ASA: T:1/ f:
NEGATIVE LOCATION: FILE #:
PROCESSED BY:
PHOTO #: 11 of 15

OFFICIAL PHOTOGRAPH
U.S. ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: impoundment - break in fence
LOCATION: COLFAX CREOSOTING
LAD008184616
CITY: Pineville COUNTY: — STATE: LA
DATE: 11/14/83 TIME: afternoon
WEATHER: (SUN) [HAZE] [CLOUDY] [RAIN] [SNOW]
PHOTOGRAPHER (Sig.) Holly Anderson
WITNESS: Tom Patterson - DNR
CAMERA: Kodak 110
FILM TYPE: ASA: T:1/ f:
NEGATIVE LOCATION: FILE #:
PROCESSED BY:
PHOTO #: 12 of 15





P 333 851 646

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO	COLFAX CREOSOTING COMPANY
STREET AND NO.	
P.O., STATE AND ZIP CODE	LAD 00 818 4616
POSTAGE	$
CONSULT POSTMASTER FOR FEES — CERTIFIED FEE	¢
OPTIONAL SERVICES — SPECIAL DELIVERY	¢
OPTIONAL SERVICES — RESTRICTED DELIVERY	¢
OPTIONAL SERVICES — RETURN RECEIPT SERVICE — SHOW TO WHOM AND DATE DELIVERED	¢
OPTIONAL SERVICES — RETURN RECEIPT SERVICE — SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
OPTIONAL SERVICES — RETURN RECEIPT SERVICE — SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
OPTIONAL SERVICES — RETURN RECEIPT SERVICE — SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES	$
POSTMARK OR DATE	

PS Form 3800, Apr. 1976

OFFICIAL PHOTOGRAPH
U.S. ENVIRONMENTAL PROTECTION AGENCY
****

SUBJECT: Process area
LOCATION: COLFAX CREOSOTING
LAD008184616
CITY: Pineville COUNTY: — STATE: LA
DATE: 11/14/83 TIME: afternoon
WEATHER: (SUN) [HAZE] [CLOUDY] [RAIN] [SNOW]
PHOTOGRAPHER (Sig.) Holly Anderson
WITNESS: Tom Patterson - DNR
CAMERA: Kodak 110
FILM TYPE: ASA: T:1/ f:
NEGATIVE LOCATION: FILE #:
PROCESSED BY:
PHOTO #: 13 of 15

OFFICIAL PHOTOGRAPH
U.S. ENVIRONMENTAL PROTECTION AGENCY
****

SUBJECT: Process area
LOCATION: COLFAX CREOSOTING
LAD008184616
CITY: Pineville COUNTY: — STATE: LA
DATE: 11/14/83 TIME: afternoon
WEATHER: (SUN) [HAZE] [CLOUDY] [RAIN] [SNOW]
PHOTOGRAPHER (Sig.) Holly Anderson
WITNESS: Tom Patterson - DNR
CAMERA: Kodak 110
FILM TYPE: ASA: T:1/ f:
NEGATIVE LOCATION: FILE #:
PROCESSED BY:
PHOTO #: 14 of 15

OFFICIAL PHOTOGRAPH
U.S. ENVIRONMENTAL PROTECTION AGENCY
****

SUBJECT: Process area
LOCATION: COLFAX CREOSOTING
LAD008184616
CITY: Pineville COUNTY: — STATE: LA
DATE: 11/14/83 TIME: afternoon
WEATHER: (SUN) [HAZE] [CLOUDY] [RAIN] [SNOW]
PHOTOGRAPHER (Sig.) Holly Anderson
WITNESS: Tom Patterson - DNR
CAMERA: Kodak 110
FILM TYPE: ASA: T:1/ f:
NEGATIVE LOCATION: FILE #:
PROCESSED BY:
PHOTO #: 15 of 15

STICK POSTAGE STAMPS TO ARTICLE TO COVER FIRST CLASS POSTAGE, CERTIFIED MAIL FEE, AND CHARGES FOR ANY SELECTED OPTIONAL SERVICES. (See front)

1. If you want this receipt postmarked, stick the gummed stub on the left portion of the address side of the article, **leaving the receipt attached**, and present the article at a post office service window or hand it to your rural carrier. (no extra charge)
2. If you do not want this receipt postmarked, stick the gummed stub on the left portion of the address side of the article, date, detach and retain the receipt, and mail the article.
3. If you want a return receipt, write the certified-mail number and your name and address on a return receipt card, Form 3811, and attach it to the front of the article by means of the gummed ends if space permits. Otherwise, affix to back of article. Endorse front of article **RETURN RECEIPT REQUESTED** adjacent to the number.
4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse RESTRICTED DELIVERY on the front of the article.
5. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in Item 1 of Form 3811.

6 III

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202

JUN 14 1989

MEMORANDUM

SUBJECT: Transmittal of RCRA Facility Assessment Evaluation

FROM: Bill Luthans, Chief
Closure Section (6H-PC)

TO: William Gallagher, Chief
ALONM Section (6H-PS)

Attached please find a copy of the following RCRA Facility Assessment Evaluation:

- Facility Name: Colfax Creosoting Company
- EPA ID Number: LAD008184616

Please advise us if more information is required and/or if you need further assistance.

Attachment

RCRA FACILITY ASSESSMENT EVALUATION

PRELIMINARY REVIEW AND VISUAL SITE INSPECTION

(NO SAMPLING VISIT)

Region 6, RCRA Permits Closure Section

FACILITY'S NAME(S): Colfax Creosoting Company

EPA ID NUMBER: LAD008184616

ADDRESS: Wadley Road, Pineville, Louisiana

LOCATION: Lat. 31° 19' 10" N, Long. 92° 26'00" W, approximately one mile south of Pineville, Louisiana.

DATE OF INSPECTION: April 4-5, 1988

SITE DESCRIPTION: Wood treater, creosote, PCP and CCA

PREPARED BY: Ecology and Environment DATE PREPARED: September 2, 1988

REVIEWED BY: Jon Rinehart DATE REVIEWED: _____

FACILITY STATUS: Undergoing closure.

ANTICIPATED DRAFT PERMIT DATE: September 1989

ANY ON-GOING STATE/FED 264, 265, or 270 CORRECTIVE ACTION OR CERCLA ACTION:
YES _____ NO X

DOES FACILITY HAVE A CERCLA FILE? YES _____ NO X

DOES FACILITY HAVE UIC WELL? YES _____ NO X

TYPE OF DRINKING WATER SUPPLY WITHIN A 3-MILE RADIUS: Ground water which varies from 90-2056 feet.

TARGET POPULATION WITHIN A 3-MILE RADIUS: The population of Pineville is 12,500, and Alexandria is 66,100.

RECOMMENDATIONS: _____ S.V. X R.F.I. _____ I.M. _____ No Further Action under RFA

(Indicate only one unless I.M. is marked)

X 3004(u) _____ 3007

Possible Enforcement Action: _____ 3008(a) _____ 3008(h)

Form Rev. 6/17/87
LD:ggr6/23/87
caf:1-9-89

I. EVALUATION

A. NUMBER OF SWMU(s)/AOC(s) INVESTIGATED DURING THE PR/VSI: 29

1. NUMBER OF SWMU(s) INVESTIGATED DURING THE PR/VSI: 27

SWMU#	NAME OF SWMU	REGULATED BY RCRA* (SUBTITLE C)	STATUS**
1.	Northeast Treated Wood Storage Area	N	A
2.	Southeast Treated Wood Storage Area	N	A
3.	West Treated Wood Storage Area	N	A
4.	Southwest Treated Wood Storage Area	N	A
5.	Recovery Pond	Y	C
6.	Settling Pond #1	Y	C
7.	Settling Pond #2	Y	C
8.	Railcar Separator	N	C
9.	Main Runoff Pathway	N	A
10.	Truck Washing Area	N	A
11.	Untreated Wood Landfill	N	A
12.	Ground Water Recovery Tank	N	A
13.	Penta/Creosote Sump Containment	N	A
14.	CCA Containment System	N	A
15.	Creosote Dehydrator	N	A
16.	Creosote Separator #1	N	A
17.	Creosote Separator #2	N	A
18.	Creosote Separator #3	N	A
19.	Penta Reclaiming Hopper	N	A
20.	Penta Separator	N	A
21.	Penta Blowdown Tank	N	A
22.	Creosote Blowdown Tank	N	A
23.	CCA Waste Water Storage Tank #1	N	A
24.	CCA Waste Water Storage Tank #2	N	A
25.	Cooling Pond	N	A
26.	Waste Water Storage Tank	N	A
27.	Visual Observation Pit	N	A

2. NUMBER OF AREAS OF CONCERN: 2

A. West Runoff Pathway
B. Creosote Unloading Area

* Y = Yes, N = No
** A = Active, I = Inactive, U = Unknown

B. NUMBER OF SWMU(s)/AOC(s) FOR WHICH AN RFI IS RECOMMENDED: 11 / 2
(Except RCRA units subject to Subpart F ground water issues refer to Section D)

1. NUMBER OF SWMU(s)/AOC(s) AT WHICH RELEASES HAVE BEEN IDENTIFIED: 6 / 0

#	SWMU/ AOC #	NAME OF UNIT	MEDIA	RATIONALE/CONCERN
1.	1.	Northeast Treated Wood Storage Area	Soil GW* SW**	Stained soil was observed in the treated wood storage areas during the VSI. These storage areas receive wood treated with any of the three preservatives used at this facility: creosote, penta, or CCA, which may have released hazardous constituents to the soil, ground water, and surface water.
2.	2.	Southeast Treated Wood Storage Area	Soil GW SW	Stained soil was observed in the treated wood storage areas during the VSI. These storage areas receive wood treated with any of the three preservatives used at this facility: creosote, penta, or CCA. These preservatives may have released hazardous constituents to the soil, ground water and surface water.
3.	3.	West Treated Wood Storage Area	Soil GW SW	Stained soil was observed in the treated wood storage areas during the VSI. These storage areas receive wood treated with any of the three preservatives used at the facility: creosote, penta, or CCA. These preservatives may have released hazardous constituents to the soil, ground water, and surface water.
4.	4.	Southwest Treated Wood Storage Area	Soil GW SW	Stained soil was observed in the treated wood storage areas during the VSI. These storage areas receive wood treated with any of the three preservatives used at the facility: creosote, penta, or CCA. These preservatives may have released hazardous constituents to the soil, ground water, and surface water.

* GW = Ground water
** SW = Surface water

#	SWMU/ AOC #	NAME OF UNIT	MEDIA	RATIONALE/CONCERN
5.	8.	Railcar Separator	Soil GW SW	This unit is an 8,000-gallon separator which is a converted railroad tank car. The separator is 7 feet in diameter and 32 feet in length. Creosote waste was pumped from the recovery pond into the separator, where further separation of creosote occurred. During the VSI, a creosote-like material was observed on a valve on the separator and the soil directly beneath it. Releases of hazardous constituents to soil, ground water, and surface water are highly possible.
6.	9.	Main Runoff Pathway	Soil GW SW	The main runoff pathway begins onsite and flows to the southwest near the process area. During this time, the main runoff pathway served as the discharge ditch for waste water generated by the penta and creosote processes. This unit does not appear to have any type of liner. During the VSI, a tar-like material was observed along the sides of the main runoff pathway. Release of hazardous constituents to soil, ground water and surface water is highly possible.

2. NUMBER OF SWMU(s)/AOC(s) AT WHICH A RELEASE IS HIGHLY POSSIBLE: 13 / 1

#	SWMU/ AOC #	NAME OF UNIT	MEDIA	RATIONALE/CONCERN
1.	10.	Truck Washing Area	Soil GW SW	This area is used to wash equipment and trucks which transport the treated wood products. The vehicles are washed on a 10-by-30-foot concrete pad. The area is not contained, and waste water produced by the washing of potentially contaminated vehicles is discharged into the main runoff pathway. The release potential to soil, ground water and surface water is high.
2.	11.	Untreated Wood Landfill	Soil GW SW	The unlined landfill is approximately one acre in size. Untreated wood scraps and sawdust are used to fill the depressed area. During the VSI, several pieces of treated wood were observed in the landfill. Release potential to soil, ground water and surface water is high.
3.	12.	Ground Water Recovery Tank	Soil GW SW	This unit is a 3,000-gallon tank which is used to contain contaminated ground water (creosote constituents) from piezometer well P-1. This tank is located on bare ground. The potential for release to soil, ground water and surface water is high.
4.	13.	Penta/Creosote Sump Containment	Soil GW SW	This unit is comprised of a sloped concrete pad surrounded by a concrete dike and a berm system. Portions of the concrete pad have been in use since the company began operation in 1948. High potential for contamination of the soil and ground water existed prior to installation of the concrete dike and berm system.
5.	14.	CCA Containment System	Soil GW SW	This unit consists of a sloped concrete pad surrounded by a concrete berm and dike system,

#	SWMU/ AOC #	NAME OF UNIT	MEDIA	RATIONALE/CONCERN
		(SWMU #14 continued)		two rain water pumps, a concrete door pit and a waste water pump. The potential for release was high before the concrete dike and berm was installed.
6.	15.	Creosote Dehydrator	Soil GW SW	This unit is a 9,971-gallon tank which receives recovered sludge from Creosote Separator #3, then dries it to acceptable moisture levels and pumps it to the Reclaimed Creosote Storage Tank. This unit has a secondary containment of a concrete dike and berm system. Potential for contamination of soil existed prior to the installation of the concrete dike and berm system. This dehydrator has been in use at this facility since 1948. The waste handled is creosote waste water sludge.
7.	16.	Creosote Separator #1	Soil GW	This unit is an 8,000-gallon converted railroad tank car, which is located near the middle of the process area on the west side of the cooling pond and adjacent to Creosote Separator #2. High potential for release to soil and ground water existed prior to the installation of the concrete dike and berm system.
8.	17.	Creosote Separator #2	Soil GW	This unit is an 8,000-gallon converted railroad tank car, which is located near the middle of the process area on the west side of the cooling pond and adjacent to Creosote Separator #1. High potential for release to soil and ground water existed prior to the installation of the concrete dike and berm system.
9.	18.	Creosote Separator #3	Soil GW SW	This unit is an 8,000-gallon converted railroad tank car, which is located near the

#	SWMU/ AOC #	NAME OF UNIT	MEDIA	RATIONALE/CONCERN
	(SWMU #18 continued)			middle of the process area on the west side of the cooling pond and adjacent to Creosote Separator #2. Waste water is pumped into this separator from the surface of Creosote Separator #2. High potential for release to soil and ground water existed prior to the installation of the concrete dike and berm system.
10.	19.	Penta Reclaiming Hopper	Soil GW	This unit is a 20,000-gallon cone-bottom tank which is located in the far southeast portion of the process area north of the penta mix tank. This tank serves as a large separation funnel for the reclaimed penta pumped here from the penta separator. This unit is surrounded by the concrete dike and berm system, but prior to installation of this system, release potential was high to soil and ground water.
11.	20.	Penta Separator	Soil GW	This unit is an 8,000-gallon converted railroad tank car, and is located near the middle of the process area on the west side of the cooling pond and adjacent to Creosote Separator #3. Prior to the installation of a concrete dike and berm system, the potential for release to soil and ground water was high.
12.	25.	Cooling Pond	Soil GW SW	This unit is a 40-foot by 30-foot concrete pond, which is located in the middle of the process area on the west side of the treating room. Process waste water circulates through the pond providing coolant needed to operate the vacuum system utilized within the

#	SWMU/ AOC #	NAME OF UNIT	MEDIA	RATIONALE/CONCERN
	(SWMU #25 continued)			treatment cylinders. This cooling pond was originally built in 1948, and was assumed to be unlined. It was reconstructed in 1986. A high potential for releases to soil, ground water, and surface water existed before reconstruction.
13.	B.	Creosote Unloading Area	Soil GW SW	This unit is the area that has been used as a creosote unloading area since the company began operation in 1948. The concrete pad was originally constructed in 1958, and reconstructed in 1982. Considering the long period of operation at this unit, and the two periods of reconstruction, a high potential exists for past releases to soil, surface water, and ground water.

3. NUMBER OF SWMU(s)/AOC(s) WHERE A DETERMINATION CANNOT BE MADE DUE TO LACK OF INFORMATION: 0 / 1

#	SWMU/ AOC #	NAME OF UNIT	COMMENTS
1.	A.	West Runoff Pathway	This unit is a runoff pathway which drains approximately the western 15 percent of the site used to air-dry the treated wood (SWMU #1). During the VSI, an indication of the presence of two substances (an orange sediment and a white sheen) which do not appear to be native to the west ditch was noted. These foreign substances need to be sampled to determine what their compositions are.

C. NUMBER OF SWMU(s)/AOC(s) FOR WHICH AN RFI IS NOT RECOMMENDED: 6 / 0
(Documentation is necessary for a unit to be included in this category.)

#	SWMU/ AOC #	NAME OF UNIT	COMMENTS
1.	21.	Penta Blowdown Tank	This unit is a 200-gallon tank, which is mounted directly on top of the penta waste water separator. A low potential exists for a release to any media originating from this unit due to the concrete dike and berm system surrounding the process area.
2.	22.	Creosote Blowdown Tank	This unit is a 200-gallon tank, which is mounted directly on top of Creosote Separator #1. A low potential exists for a release to any media originating from the concrete dike and berm system surrounding the process area.
3.	23.	CCA Waste Water Storage Tank #1	This unit is a 17,000-gallon tank, which is located in the far east portion of the process area northeast of the penta mix tank. This unit is located inside a concrete dike and berm system; therefore, the release potential for any media is low.
4.	24.	Waste Water Storage Tank #2	This unit is a 6-foot by 18-foot tank, which is located in the eastern portion of the process area to the southeast of the CCA Concentrate Storage Tank. A low potential exists for a release to any media from this unit.
5.	26.	Waste Water Storage Tank	This unit is an 18,000-gallon tank, which is located in the western portion of the process area to the northwest of the cooling pond and north of the creosote storage tank. Waste water from the creosote and penta separators is stored here prior to being discharged to the City of Pineville sewer system. A low potential for release exists for all media from this unit.
6.	27.	Visual Observation Pit	This unit is a 10-foot by 20-foot open concrete tank. Waste water from the storage tank in conveyed into the open-aired tank before it leaves the site via the sewer outfall pipe. A low potential for release exists for all media.

D. SUPPLEMENTAL INFORMATION ON RCRA REGULATED UNITS: # OF UNITS: 3

#	SWMU/ AOC #	NAME OF UNIT	COMMENTS
1.	5.	Recovery Pond	This unit is approximately one acre in size and contains four smaller sludge pits along its eastern boundary. The company terminated discharge of waste water to the pond in 1983, when contamination by phenol was detected in a downgradient monitoring well. The pond was officially closed on October 23, 1986. (Is closure certified by the State?) This portion of the facility is in post-closure phase and a remedial program of waste recovery has been implemented.
2.	6.	Settling Pond #1	This pond was approximately 990 square feet in surface area and had a volume of 290 cubic yards. This pond was part of a system utilized to recover penta and creosote from waste water generated by these wood treatment processes. This pond was officially closed on October 23, 1986. (Is this unit certified closed by the State?) Contaminated ground water has been identified in downgradient well MW-3. Sampling conducted by LDEQ on March 16, 1983, showed concentrations of phenols at 0.14 ppm.
3.	7.	Settling Pond #2	This pond was approximately 1,070 square feet in surface area and had a volume of 240 cubic yards. This pond was part of a system used to recover penta and creosote from waste water. Analytical data from a routine compliance sampling of monitoring wells at this facility, conducted by LDEQ on March 16, 1983, showed concentrations of phenols at 0.14 ppm in downgradient monitoring well MW-3. This pond was officially closed on October 23, 1986. (Has this unit been certified and approved by the State?)

II. FINDINGS

A. RECOMMENDATIONS

CONTRACTOR: The following units are recommended by the contractor to be included in an RFI:

1) SWMU #1: Northeast Treated Wood Storage Area
2) SWMU #2: Southeast Treated Storage Area
3) SWMU #3: West Treated Wood Storage Area
4) SWMU #4: Southwest Treated Wood Storage Area
5) SWMU #8: Railcar Separator
6) SWMU #9: Main Runoff Pathway
7) SWMU #10: Truck Washing Area
8) SWMU #11: Untreated Wood Landfill
9) AOC A: West Runoff Pathway
10) AOC B: Creosote Unloading Area

EPA: The following units are recommended by EPA to be included in an RFI:

1) SWMU #1: Northeast Treated Wood Storage Area
2) SWMU #2: Southeast Treated Wood Storage Area
3) SWMU #3: West Treated Wood Storage Area
4) SWMU #4: Southwest Treated Wood Storage Area
5) SWMU #8: Railcar Separator
6) SWMU #9: Main Runoff Pathway
7) SWMU #10: Truck Washing Area
8) SWMU #11: Untreated Wood Landfill
9) SWMU #12: Ground Water Recovery Tank
10) SWMU #13: Penta/Creosote Sump Containment
11) SWMU #14: CCA Containment System
12) SWMU #15: Creosote Dehydrator
13) SWMU #16: Creosote Separator #1
14) SWMU #17: Creosote Separator #2
15) SWMU #18: Creosote Separator #3
16) SWMU #19: Penta Reclaiming Hopper
17) SWMU #20: Penta Separator
18) SWMU #25: Cooling Pond
19) AOC A: West Runoff Pathway
20) AOC B: Creosote Unloading Area

CONCUR: _____ DATE: _____

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

III .S.A

LAD008184616

AUG 12 1988

MEMORANDUM

Subject: RCRA Facility Assessment for Colfax Creosoting Company
FIT Evaluation

From: Lydia M. Boada Clista
Technical Section (6H-CT)

To: David Wineman
FIT RPO Region VI
Hazardous Waste Section (6E-SH)

We have reviewed the RCRA Facility Assessment Report done by Ecology and Environment, Inc. (E&E) for Colfax Creosoting and find it basically to be a good report.

The Introduction, Site Description and Environmental Setting sections are well done and "to the point". The Environmental Setting section especially contained good information regarding hydrology, water sources and uses, population and receptors. The data coverage on SWMUs is for the most part adequate and discussion format is quite effective.

We feel, however, that there are three serious deficiencies in the work and suggest a few other points that will improve the quality of the report. These are as follows:

1) The report needs to contain specific recommendation regarding further investigative work for each SWMU along with a brief statement justifying the work. Should an RFI be done and why.

   The Conclusions section points toward recommendations for additional work needed but different people reading the same conclusion may well arrive at a different recommended program. EPA needs to see recommendations by the contractor performing the inspection and writing the report.

2) The definition of SWMU needs to be closely adhered to for the purpose of identifying SWMUs. In order for processing units to be identified as SWMUs, there must be evidence that they have been contaminated as a result of routine and systematic releases. This does not seem to be the case for the 36 units identified as SWMUs simply because they are associated with the process area. The report does not include enough information to indicate routine and systematic releases occured at these sites.

CONCURRENCES

SYMBOL		6H-CT					
DATE	AMMACK	LUTHANS					

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

*U.S. GPO : 1986-159-319

3) The report needs a disclaimer similar to the following example:

DISCLAIMER

This report was prepared for the U.S. Environmental Protection Agency, Region VI (EPA) by _____ in fulfillment of Contract Number _____, Work Project Assignment Number _____. The opinions, findings, and conclusions expressed herein are those of the contractor and not nesessarily those of the EPA or other cooperating agencies. Mention of company or product names is not to be considered an endorsement by the EPA.

This document is intended to assist EPA and State Personnel in exercising the discretion conferred by regulation in developing requirements for an owner/operator to conduct the RCRA Facility Investigation (RFI) pursuant to 40 CFR 264. EPA will not necessarily limit RFI or other requirements to those that correspond with the recommendations set for therein. EPA and State personnel must exercise their technical judgment in using the RCRA Facility Assessment report as well as other relevant information in determining what RFI or other requirements to be included in a permit or an order.

Some other considerations that we believe could strengthen this report are:

1) More care care should be exercised in use of such terms as "water" and "wastewater". An example is under discussion of SWMU 41 - CCA Work Tank #1. The paragraph under "Description" uses this term wastewater and under "History" uses the term "water". This leaves a question as to what is in the tank.

2) The ambivalent nature of some of the statements used repetively should be eliminated. An example is the statement in the section for "Potential Release" for several SWMUs "There is a low potential for groundwater release originating from this area, due to the small quantities of wastes that might be present in the soils contaminated from dripping preservatives, but ground water release cannot be ruled out". We need a stronger indication of the condition that exists as this information should be the basis for deciding an action to be taken.

   Another statement of similar nature used several times is "contamination of soils prior to the installation of the concrete dike and berm containment system by preservative drippage, spillage and tank leakage cannot be ruled out". Why is it believed that such releases might have occurred?

   Both of these statements are taken from discussion of the potential for releases from individual SWMUs. It would be helpful to the reader if the writer would use whatever data is available to support the position believed to be the most logical and then recommend more data be obtained if the position is not supported sufficiently. The writer should not cast doubt on his position unless he intend to adopt a different position that can be better supported.

3) Information on SWMUs that is included under "Additional Aspects" should more appropriately be integrated with detailed information on each SWMU under the section "Solid Waste Management Units".

4) There is a redundancy between the sections "Data Gaps" and "Conclusions". We suggest merging these two sections and using the merged section as a basis for developing a recommended program.

5) The VSI field log should not be included as an appendix to the RFA report.

We hope these comments will be useful to E&E in preparing the final of this report and other reports in the future. We are available for further discussion if it would be helpful.

cc: S. Becker (6H-C)

bcc: V. Cammack (6H-CT)
B. Luthans (6H-CT)

III, 5.A

RECORD OF COMMUNICATION

☒ PHONE CALL ☒ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE
☐ OTHER (SPECIFY)
(Record of item checked above)

TO: Bill Luthans

FROM: Van Cammack

DATE 6/17/88

TIME 10:45 a.

SUBJECT Calfax Creosoting Co Pineville, La.
LAD008184616

SUMMARY OF COMMUNICATION

As a follow-up on the report from Ecology and Environment, Inc. regarding deposit of unknown substance at the above facility noticed while making a VSI, I discussed this matter with Bill Taylor, Bill Honker and at their direction, gave a copy of the letter report to Rich Mayer. I also discussed it briefly by phone with Ken Huffman in the Water Management Div. Industrial Permits. At his suggestion, I mailed him a copy as a "matter of information".

The attached copies of the letter report are for file III. 5. A

CONCLUSIONS, ACTION TAKEN OR REQUIRED

INFORMATION COPIES
TO: Rich Mayer, Lydia Bouda, III. 5. A.

III.5.A.

ECOLOGY AND ENVIRONMENT, INC.

DALLAS, TEXAS

MEMORANDUM

To: David Wineman, Region VI RPO

Thru: FOR K. H. Malone, Jr., FITOM

Thru: I. Sekelyhidi

From: RW Raymond Wayne, FIT Ground Water Hydrologist

Date: June 8, 1988

Subj: RCRA Facility Assessment at the Colfax Creosoting Company, Pineville, LA (LAD008184616)
TDD# F06-8709-35
PAN# FLA0239CAA

This memorandum is a follow-up to discussions with Lonnie Ross on June 2 and 3, 1988 following the RCRA training session, concerning the deposits of unknown substances in the uncontrolled surface water runoff paths at the Colfax Creosoting Company site.

Figure 1 is a sketch of the Colfax facility with the approximate locations of the runoff pathways and areas where unknown substances in the pathways were photographed. The photographs (1 through 9) were taken during the FIT RCRA Facility Assessment Visual Site Inspection (VSI) on April 4 and 5, 1988.

Main Runoff Pathway

The main ditch begins on-site and flows southwest near the process area (process area runoff is contained). The ditch receives off-site runoff from a residential area and from an adjacent railroad track. A second runoff path flowing toward the northeast merges with the main ditch at a culvert beneath the track. The combined flow moves southeast next to the former surface water impoundment and a scrap wood landfill. The flow exits the site through an underground pipe. The main runoff pathway drains approximately 85 percent of the site.

The main ditch was used from 1948 to 1975 as an open, unlined conduit to dispose of untreated process water. The process water flowed into the local surface water runoff path and entered the Red River approximately two miles from the site. From 1975 to 1983, a pipe in the main ditch was used to transport the process water to the former surface impoundment for recycling. After 1983, use of the impoundment and pipe were discontinued.

The substance in the main ditch (Photographs 1 through 6) appears to be a creosote-like tar. The light colored portion of the substance in Photographs 5 and 6 feels hard when stepped on, while the darker areas (Photograph 6) feel pliable. The abrupt edges on the substance (Photograph 6) suggest that the substance may be eroding during heavy runoff. Hnu reading taken several inches away from the substance did not show the presence of volatile organics.

West Runoff Pathway

The western runoff path flows uncontrolled along the southeast side of the railroad track at the northwest boundary of the facility. The branches flowing southwest and northeast of the ditch merge at a culvert (Photograph 7) and exit the site beneath the track. The western ditch begins on-site and receives runoff from the railroad track and from a portion of the facility used for storing/drying treated wood. The western runoff pathway drains approximately 15 percent of the site.

An orange sediment-like substance (Photograph 7) was observed near the culvert in the southwest branch of the west ditch. In addition, a white sheen was observed (Photographs 8 and 9) further upstream in the southwest branch of the west ditch. A similar appearing sheen was observed in a puddle in the treated wood storage/drying area near the west ditch. The Hnu did not show any elevated readings in the west runoff path.

Concerns

It appears that unknown substances have been deposited in both surface water runoff pathways at Colfax Creosoting Company, which may migrate to the Red River, approximately two miles downstream. One of the substances appears to be a creosote tar-like material. Portions of the tar-like substance appear eroded. Neither pathway has any containment controlling the off-site migration of the substances.

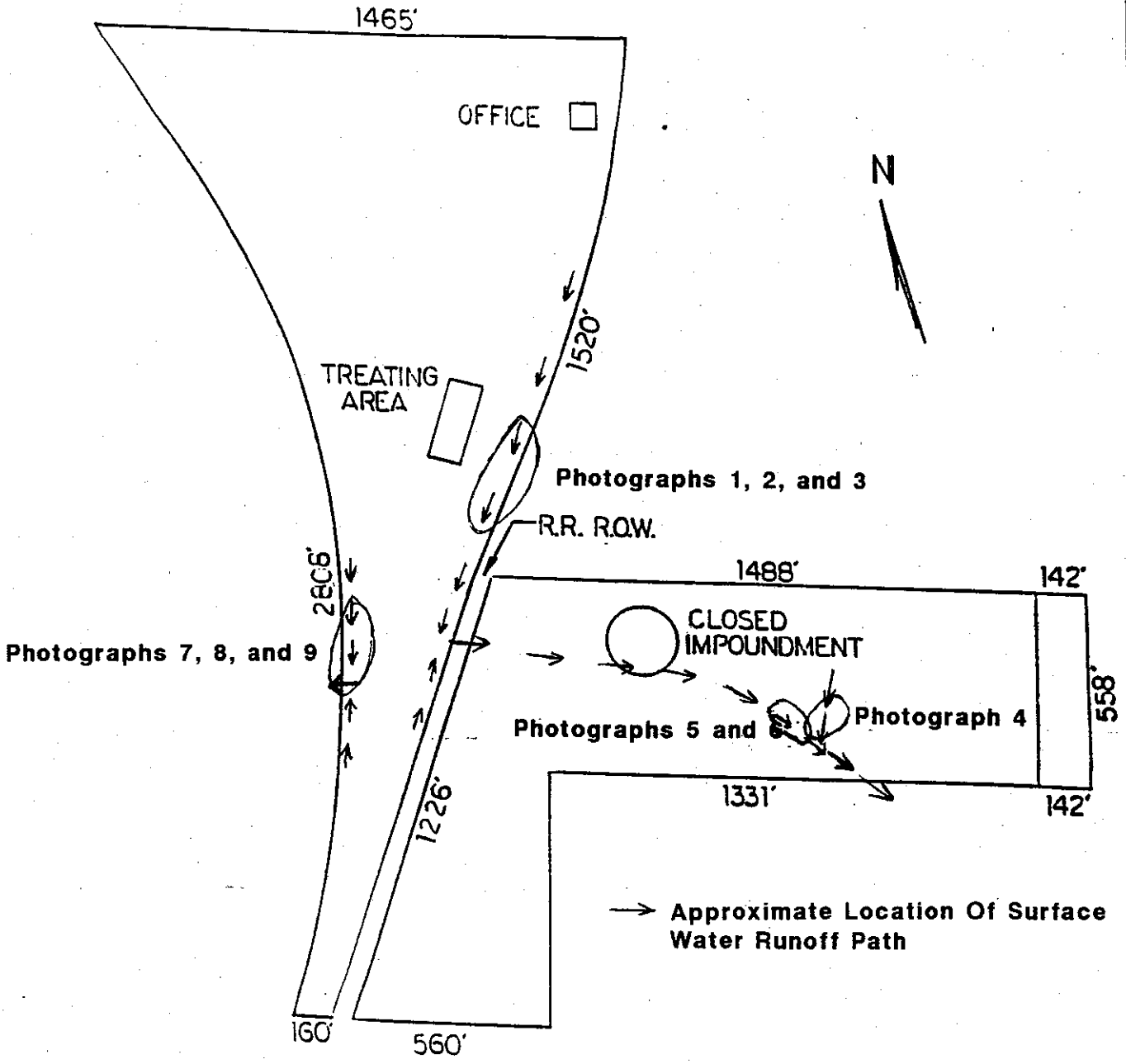


Figure 1. Approximate Locations Of Observed Substances In The Surface Water Runoff Paths. SCALE: 1"=400'

(after Ball Engineering, Inc., 1988)

Colfax Creosoting Company
Pineville, Louisiana
LAD008184616

NO. 1

PHOTOGRAPHER/WITNESS
I. Schekpidi / Ray Wayne

DATE / TIME / DIRECTION
4/5/88 / 10:44 / Northwest

COMMENTS
Discharge points of process effluent water (pipes). Tar-like substance along ditch (center).

PHOTOGRAPHER/WITNESS
I. Schekpidi / Ray Wayne

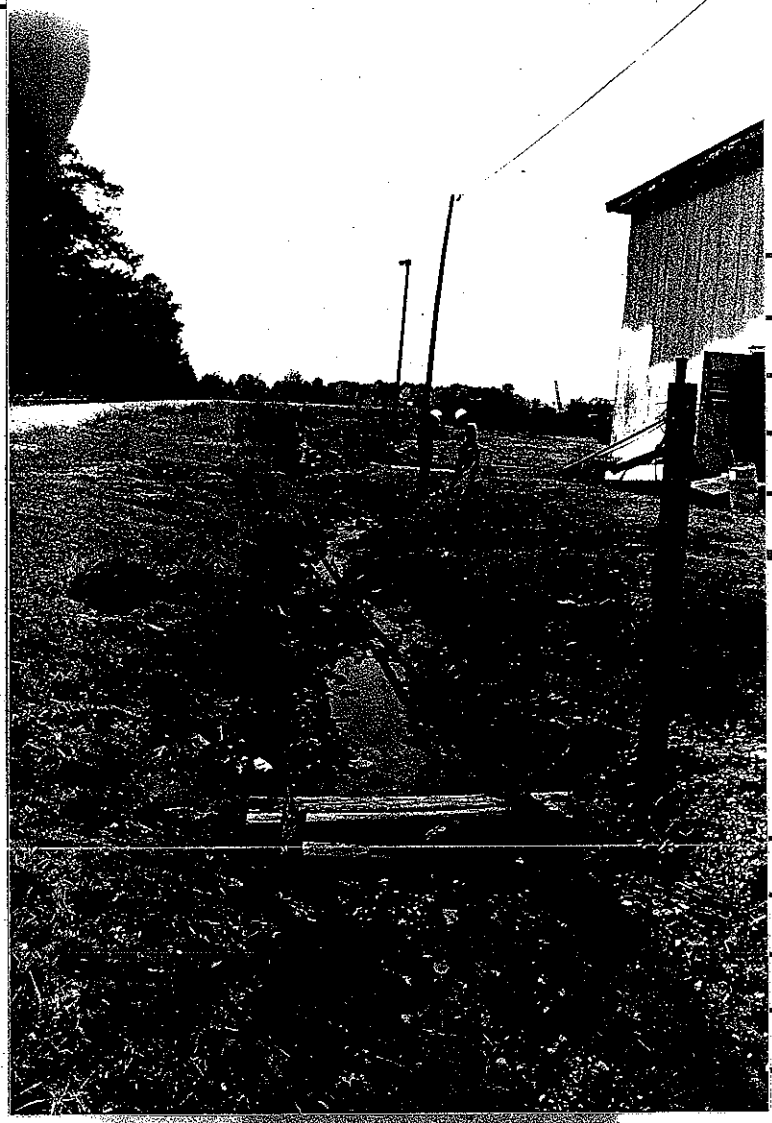
DATE / TIME / DIRECTION
4/5/88 / 10:46 / Northwest

COMMENTS
Close-up of drainage ditch. Tar-like substance at lower right and upper left

NO. 2

Colfax Creosoting Company
Pineville, Louisiana
LAD008184616

NO. 3



PHOTOGRAPHER/WITNESS
I. Sekeyiwa / Ray Wayne
DATE / TIME / DIRECTION
4/5/88 / 10:46 / Southwest
COMMENTS
Deposits of tar-like substance (dark area on banks of ditch) in drainage ditch leading to the former recovery pond.

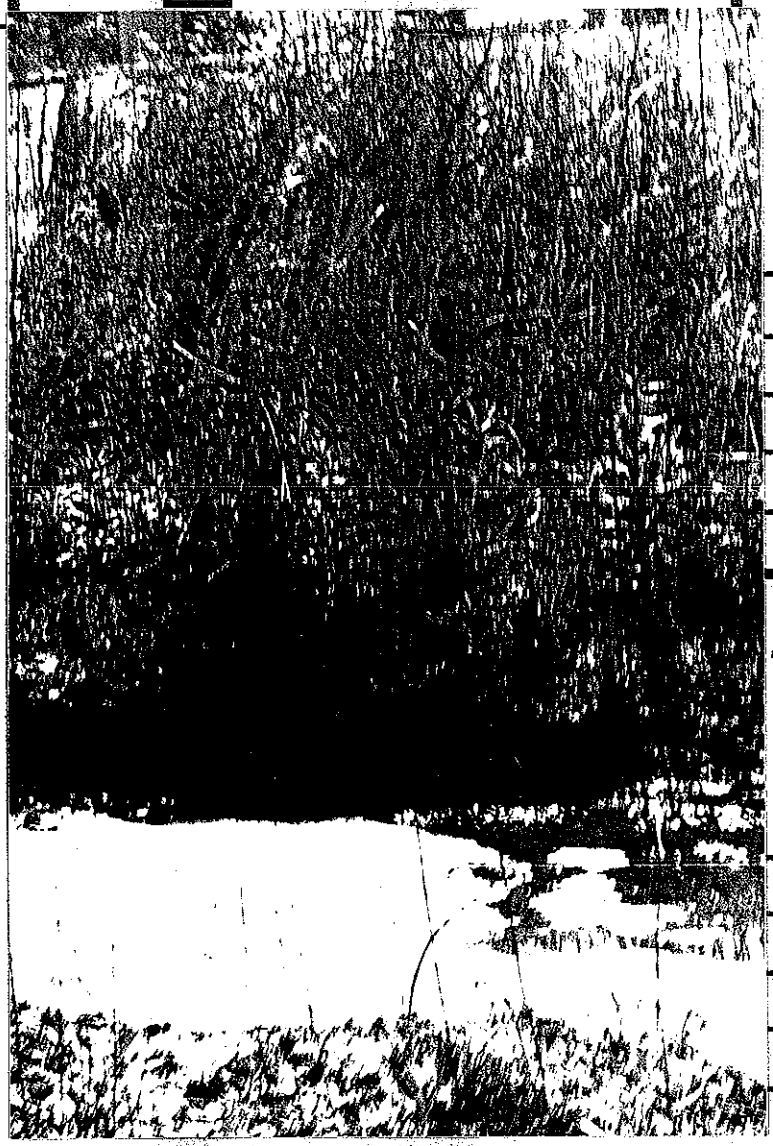
PHOTOGRAPHER/WITNESS
/ Ray Wayne
DATE / TIME / DIRECTION
4/5/88 / 11:03 / Southwest
COMMENTS
Small on-site ditch flowing southwest into main ditch south of former pond. Picture taken approximately 15 feet upstream of main ditch.⊗

⊗Note: Tar-like substance (dark area) along bank.

NO. 4

Colfax Creosoting Company
Pineville, Louisiana
LAD008184616

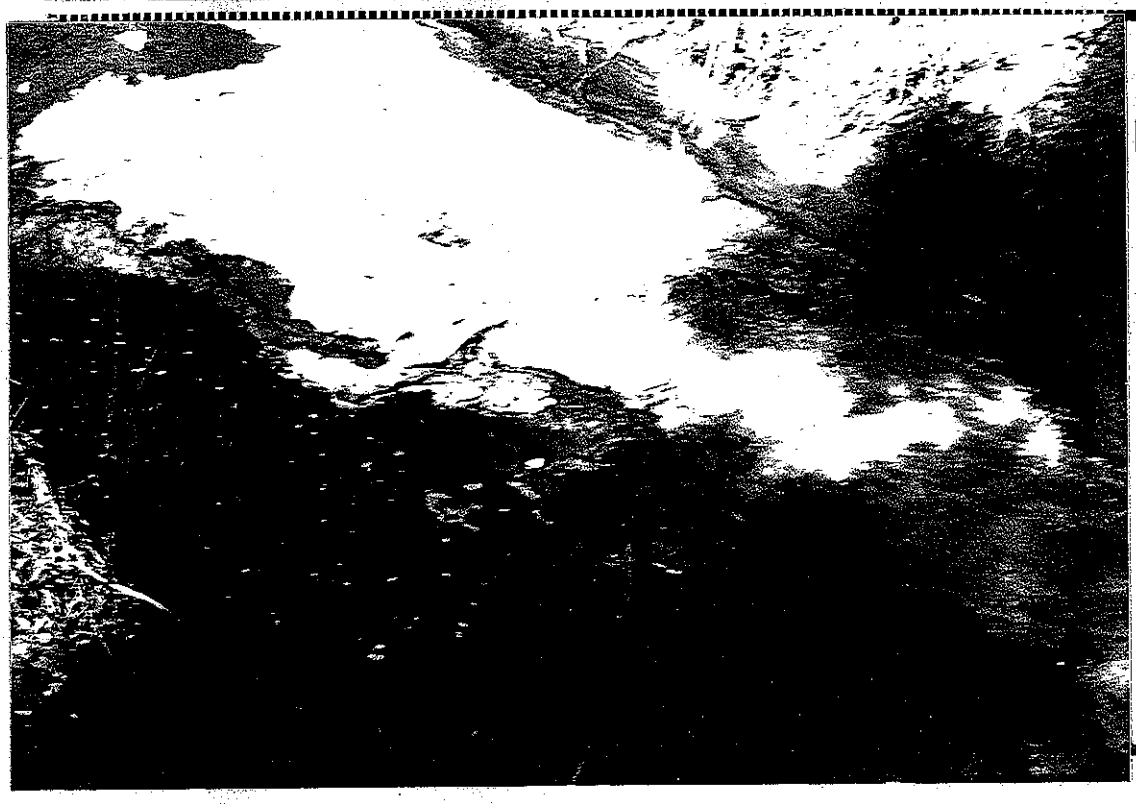
NO. 5



PHOTOGRAPHER/WITNESS
Ray Wayne / Baker DoCesi
DATE / TIME / DIRECTION
4/4/88/16:09/West
COMMENTS
Main on-site surface water pathway. Tar-like substance (white area) in creek. School building in rear.

PHOTOGRAPHER/WITNESS
Ray Wayne / Baker DoCesi
DATE / TIME / DIRECTION
4/4/88/16:07/Northeast
COMMENTS
Main surface water pathway. Close-up of tar-like substance.

NO. 6



Colfax Creosoting Company
Pineville, Louisiana
LAD008184616

NO. 7

PHOTOGRAPHER/WITNESS
I. Sekely/Ridi / Ray Wayne

DATE / TIME / DIRECTION
4/5/88 / 11:40 / West Down

COMMENTS
Culvert draining surface water runoff from site (beneath railroad track). West drainage path. Discolored sediment at lower right.

PHOTOGRAPHER/WITNESS
I. Sekely/Ridi / Ray Wayne

DATE / TIME / DIRECTION
4/5/88 / 11:52 / North Down

COMMENTS
West drainage path approximately 60 feet northeast of culvert. Sheen on ditch bed.

NO. 8

Colfax Creosoting Company
Pineville, Louisiana
LAD008184616

NO. 9

PHOTOGRAPHER/WITNESS
I. Sekiewicz / Ray Wayn

DATE / TIME / DIRECTION
4/5/88/12:05/Northeas

COMMENTS
West drainage path approximately 80 feet northeast of culvert. Sheen on ditch bed.

PHOTOGRAPHER/WITNESS

DATE / TIME / DIRECTION

COMMENTS

NO.

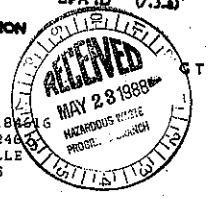
VJM 04/88

4/12/88
Date

III

LAD008184611
EPA ID (U.S.)

RCRA INSPECTION



GTOR

COLFAX CREOSOTING COMPANY
NORTON CLYDE M VICE PRESIDENT
PO BOX 231
PINEVILLE LA 71360
WADLEY ROAD P* 71360

LAD008184611G
3184422460
PINEVILLE
RAPIDES

HAZARDOUS WASTE FACILITIES, Type and Number

STORAGE:

See Narrative

___ Container Storage Areas
___ Tanks
___ Waste Piles
___ Surface Impoundments 3 closed

TREATMENT:

___ Tanks
___ Surface Impoundments
___ Incinerators
___ Other (Chem., Phys., Bio. or Thermal)

DISPOSAL:

___ Injection Wells
___ Landfills
___ Land Treatment
___ Surface Impoundments
___ Ocean Disposal

CHECKLISTS REQUIRED:

✓ RCRA CEI TSD
✓ GROUNDWATER
✓ CLOSURE/POST CLOSURE
___ LAND TREATMENT(FARM)

Does this information agree with permit application? Yes No

INSPECTOR(S):
Vic Montelaro
Susan Frytag - EPA

PARTICIPANT(S):
Clyde Norton

Report Due EPA 6-6-88

Report Sent EPA _____

INSPECTION REPORT TO EPA

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF SOLID & HAZARDOUS WASTE
HAZARDOUS WASTE DIVISION

[redacted]

NARRATIVE TO RCRA

DATE 4/12/88

COMPANY Colfax Creosoting Co. EPA # LAD008184616

MAILING ADDRESS P. O. Box 231, Pineville

MANAGER Clyde Norton CONTACT _____ PHONE # 318/442-2467

OPERATION LOCATION Wadley Road, Pineville PARISH Rapides

TYPE OF OPERATION Wood Preserver

REASON FOR VISIT Post Closure - Ground Water Inspection

INVESTIGATORS Victor Montelaro PERSONS INTERVIEWED Clyde Norton

Susan Freytag, EPA John Ball

NARRATIVE:

Inspection of Colfax Creosoting revealed the facility to be in corrective action under the Ground Water Monitoring Program. The facility is utilizing 5 wells for the closed RCRA impoundments under their post closure CARE plan. The monitoring and corrective action system consists of the following:

MW-1, upgradient well; MW-2, MW-5, P-4, MW-4 are RCRA wells. P-1, recovery well. P-2, P-3, MW-3 are monitor recovery wells.

The facility determined G.W. contamination during a sampling event on 6/12/86 but failed to perform the calculations and notify the Department in the prescribed time. The calculations were performed on 2/27/87 and a letter was submitted to the Department the same day.

The facility did not draft a formal corrective action plan for approval by the Dept., but submitted a letter stating changes in analytical parameters and received an approval response from the G.W. Div.

The facility implemented a recovery program which utilizes a 6000 gal tank truck as temporary storage facility. The contaminated water is then transferred to wastewater

(cont'd page 2)

REPORT BY: Victor Montelaro
Victor Montelaro 4/28/88

REVIEWED BY: _____

THOMAS H. PATTERSON
Enforcement Program Manager

Narrative to RCRA 4/12/88 (cont'd)

treatment unit and then discharged into sanitary sewer.

The tanker (container) doesn't have any markings or containment,which should be required if the contaminated G.W. is to be considered a "hazardous Waste".

Review of the Post-Closure Plan revealed discrepancies in how the cost estimates were derived. The figures did not include the costs of treating and disposing of the contaminated ground water. Also, the prices for the analytical work appeared to be extremely low, along with the maintenance cost estimate.

The consultant, John Ball,was informed of these problems and is to provide a revised ground water assessment and corrective action plan along with a revised Post Closure Plan.

Colfax Creosoting presently doesn't generate any hazardous waste or recyclable materials from the operation. The impoundments have been closed and certification received and accepted by the Department. The process has been changed to a closed loop which reclaims the oils from the process water and the waste water is disposed of into the city sanitary sewer. The sludges which would have been routinely generated from the cylinders and oil-water separator are kept in suspension in the process by using agitators and are injected under pressure into certain hardwood timbers being utilized for specific purposes.

Requested that documentation, in the form of a schematic and corresponding narrative, be provided to the Department for review and concurrence before their generator status could be rescinded.

RCRA COMPLIANCE INSPECTION REPORT
GENERATORS CHECKLIST

Colfax

Note: On multiple part questions, circle those not in compliance.

Section A - EPA Identification NO.

1. Does Generator have EPA I.D. NO.? (262.12 - EPA I.D. No.) ✓ Yes ___ N
   CLASS I
   a. If yes, EPA I.D. No. LAD008184616

Section B - Hazardous Waste Determination

1. Does generator generate hazardous waste(s) listed in Subpart D (261.30 - 261.33 - List of Hazardous Waste) 7.2
   a. If yes, list wastes and quantities on attachment (Include EPA Hazardous Waste No.) ✓ Yes ___ No
   Recovery well removes 12-20 gals/hr.
   (Provide waste name and description.)
   K001 Contaminated Recovered G.W. discharged into POTW
2. Does generator generate solid waste(s) that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) (261.20 - 261.24 - Characteristics of Hazardous waste.)7.2b)1). ___ Yes ✓ No
   a. If yes, list wastes and quantities on attachment. (Include EPA Hazardous Waste No.) (Provide waste name and description)
   b. Does generator determine characteristics by testing or by applying knowledge of processes? Process
      1. If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)? ___ Yes N/A No
      2. If equivalent test methods used, attach copy of equivalent methods used.
   C. Has generator determined nature of all waste? (7.2) Yes No
3. Are there any other solid wastes deemed non-hazardous generated by generators? (i.e. process waste streams, collected matter from air pollution control equipment, water treatment sludge, etc.)7.2 ✓ Yes ___ No
   Process WASTE WASTE WATER
   a. If yes, did generator determine non-hazardous charcteristics by testing or knowledge of process? Process
      1. If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)? N/A No
      2. If equivalent test methods used, attach copy of equivalent methods used.
   b. List wastes and quantities deemed non-hazardous or processes from which non-hazardous wastes were produced. (Use narrative explanations sheet.)
4. Are any wastes recycled, reused or reclaimed on-site? ___ Yes ✓ No

   If yes, use narrative to describe the type and quantity of the waste and the method used for reclamation.

Site Name: Colfax
I.D. Number: 44618

5. Are any wastes shipped off-site for reclamation? IF Cylinders are cleared The materials would be shipped Yes ✓ No
If yes, use narrative to describe the type and quantity of the waste and its destination. Also give a description of storage prior to shipment. Forte Pulled out. Ship For Recycling

Section C - Manifest

1. Does generator ship hazardous waste off-site? (Subpart B - The Manifest) None since closure of Haz. Facilities. ___ Yes ___ No
   a. If no, do not fill out Section C and D.
   b. If yes, identify primary off-site facility(s). (Use narrative explanations sheet.)
2. Has generator shipped hazardous waste off-site since November 19, 1980? ✓ Yes ___ No
3. Is generator exempted from regulation because of:
   Small quantity generator (261.5 - Special requirements) ___ Yes ✓ No
   OR
   Produces non-hazardous waste at this time (261.4 - Exclusions) ___ Yes ✓ No
4. If not exempted does generator use manifest? (262.20 - General requirements) 7.4a)1) ✓ When waste is generated Yes ___ No
   a. If yes, does manifest include the following information (262.21 - Required information) (Break up items or circle ones not on manifest)
      1. Manifest Document No. 6.2a)1) & 7.4b) ___ Yes ___ No
      2. Generators Name, Mailing Address, Tele. No. 6.2a)2) & 7.4b) ___ Yes ___ No
      3. Generator EPA I.D. No. 6.2a)2), 6.6c), & 7.4b) ___ Yes ___ No
      4. Transporter(s) Name and EPA I.D. No. 6.2.2)3) & 6.6c) ___ Yes ___ No
      5. a. Facility Name, Address and EPA I.D. No. 6.2a)4), 6.6c), & 7.4b) ___ Yes ___ No
      6. DOT description of the waste 6.2a)5) ___ Yes ___ No
      7. a. Quantity (weight or volume) ___ Yes ___ No
         b. Containers (type and number) 6.2a)6) ___ Yes ___ No
      8. Emergency Information (XXXXXXX) 7.4a)4) (special handling instructions, Phone No.) ___ Yes ___ No
      9. Waste minimization certification ___ Yes ___ No

Effective 9/1/85

Site Name: Celtex
I.D. Number: 4816

9. Is the following certification on each manifest form? 6.2b) & 7.4b)2) ✓ Yes ___ No

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

5. Does generator retain copies of manifests? 7.6a)1) ✓ Yes ___ No

(Check completed manifests at random. Indicate how many manifests were inspected, how many violations were noted and the type of violation.)

If yes, complete a through e. If questions contain more than one item, circle those not in compliance. (263.23 Use of the Manifest)

a. (1) Did generator sign and date all manifests inspected? 7.4d)1) ✓ Yes ___ No

b. (1) Did generator obtain handwritten signature and date of acceptance from initial transporter? 7.4d)1) ✓ Yes ___ No

c. Does generator retain one copy of manifest signed by generator and transporter? 7.4d)1) ✓ Yes ___ No

d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? 6.3b)1) ✓ Yes ___ No

e. If copy of manifest from facility was not returned within 45 days, did generator file an exception report? (262.42 - Exception reporting) 7.6c) ✓ Yes ___ No

(1) If yes, did it contain the following information: Legible copy of manifest. ✓ Yes ___ No

AND

Cover letter explaining generators efforts to locate waste. ✓ Yes ___ No

f. Does (will) generator retain copies for 3 years? 7.6a)1) ✓ Yes ___ No

Site Name: Colfax
I.D. Number: Unk

Section D - Pre-Transport Requirements

1. Does generator package waste? ___ Yes ✓ No

   If no, skip to question 9.
   If yes, complete the following questions.

Inspect containers ready for immediate shipment. If there are no such containers, skip to question 8.

2. Does generator package waste in accordance with 49 CFR 173 178, and 179? (DOT requirements) (262.30 - Packaging) 7.5a) ___ Yes ___ No

3. Are containers to be shipped leaking or corroding or bulging? ___ Yes ___ No
   Use narrative explanations sheet to describe containers and condition.

4. Does the generator use DOT labeling requirements in accordance with 49 CFR 172 when containers are offered for shipment? (262.31 - Labeling) 7.5b) ___ Yes ___ No

5. Does the generator mark each package in accordance with 49 CFR 172 when containers are offered for shipment? (262.32 - Marking) 7.5c) ___ Yes ___ No

6. a. Is each container of 110 gallons or less marked with the following label when containers are offered for shipment? ___ Yes ___ No

   Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

   Generator's Name and Address _____

   _____

   Manifest Document Number _____

   b. If other labels exist, list in narrative.

7. If there are any vehicles present on-site loading or unloading hazardous waste, inspect for presence of placards. Note this instance on narrative explanation sheet.

8. Satellite Accumulation (effective June 20, 1985)

   a. Does the generator accumulate waste in containers at or near "satellite" generation points? ___ Yes ✓ No

      If no, skip to question 9.

      If yes, complete the following.

b. Are containers in good condition? ___ Yes ___ No

c. Is the waste compatible with the containers? ___ Yes ___ No

d. Is waste transferred from leaking containers or otherwise managed to control leakage? ___ Yes ___ No

e. Are containers closed? ___ Yes ___ No

f. Are containers marked with the words "hazardous waste" or identification of the contents? ___ Yes ___ No

g. Has waste accumulation exceeded one (1) quart of acutely hazardous waste (261.33 e.) or 55 gallons of other hazardous waste? ___ Yes ___ No

If yes,

1. Has the container holding the excess amount been marked with the date the excess began accumulating? ___ Yes ___ No

2. Have excess amounts remained in the satellite accumulation area longer than three (3) days? ___ Yes ___ No

9. Accumulation Time (262.34 - Accumulation Time)

a. Is the site a permitted/interim status storage facility? ✓ Yes ___ No
7.5e)
If yes, skip to Section E, and complete and attach the TSD checklist and appropriate supplemental checklists. If no, answer rest of question #9.

N/A

b. Is hazardous waste shipped offsite within 90 days? ___ Yes ___ No

c. Is waste stored in containers or tanks? ___ Yes ___ No

d. Is the beginning date of accumulation time clearly indicated on each container? 7.5e)1) ___ Yes ___ No

e. Is each container or tank marked with the words "Hazardous Waste"? 7.5e)1) ___ Yes ___ No

f. Complete and attach the containers/tanks supplemental checklists as appropriate.

g. If generator accumulates waste on-site for less than 90 days, complete RCRA Generators Checklist Supplement.

Site Name: Coltax
I.D. Number: 4616

Section E - Recordkeeping and Reporting

1. Is generator keeping the following reports for a minimum of three (3) years? (262.40 - Recordkeeping)

   a. Manifests and signed copies from designated facilities? 7.6a)1) ✓ Yes ___ No

   b. Biennial reports (or reports as required by state agencies) 7.6a)2) ___ Yes ___ No

   c. Exception Reports 7.6a)2) ✓ Yes ___ No

   d. Test results, where applicable. 7.6a)3) ___ Yes ___ No

2. Where are records kept (at facility or elsewhere)? FACILITY

3. Who is in charge of keeping the records? Name Clyde Norton Title Mgr.

Section F - Special Condition

1. Has generator received from or transported to a foreign source any hazardous waste? (262.50 - International Shipments) 7.7a) ___ Yes ✓ No

If yes,

   a. Has a note been filed with the R.A.? ___ Yes N/A No

   b. Is this waste manifested and signed by Foreign Consignee? ___ Yes ___ No

   c. If generator transported wastes out of the country has he received confirmation of delivered shipment? ___ Yes ___ No

   d. Has the generator filed an annual report (by March 1 of each year) giving the type, quantity, frequency and destination of all exported hazardous waste? (Per HSWA 1984) 7.7a)2) ___ Yes ___

Section G - Spills

1. Is all spilled material or material trapped in sumps that is a hazardous waste or that will be disposed of as a hazardous waste cleaned up in a timely manner? 7.11 ✓ Yes ___ NO

COLFAX
4616

RCRA COMPLIANCE INSPECTION REPORT
TSD FACILITIES CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.? (265.11 - Identification Number) 23.5 See NARRATIVE ✓ ___ Yes ___ No

   A. If yes, EPA I.D. No. LAD008184616
   If no, explain _____

2. Has facility received hazardous waste from a foreign source? (265.12 - Required notices) ___ Yes ✓ No

   A. If yes, has he filed a notice with the Reg. Admin. ___ Yes ___ No

3. Has the facility received waste from off-site for recycling, reuse or reclamation? ___ Yes ___ No

   If yes, describe waste type and amount and method to be used.

Waste Analysis

4. Has the owner/operator obtained detailed chemical and physical analyses of representative samples of all hazardous wastes prior to treating, storing or disposing of those wastes? 23.7 & 9.10a)1) ___ Yes ___ No

   If yes,

   a. Have the analyses been repeated as the processes or operations generating the wastes change? 9.10a)3) ___ Yes ___ No

   b. For off-site facilities are analyses repeated when the waste received does not match the waste identified on the accompanying manifest? 9.10a)3) ___ Yes ___ No

5. For off-site facilities, is each shipment of hazardous waste received at the facility inspected and if necessary, analyzed to determine if it corresponds to the waste listed on the accompanying manifest? 9.10a)4) ___ Yes ___ No

6. Does the facility have a written waste analysis plan? (265.13 - General Waste Analysis) 9.10b) ___ Yes ___ No

   a. If yes, is a copy maintained at the facility? ___ Yes ___ No

7. Does the waste analysis plan include the following:

   a. Parameters for which each waste will be analyzed and the rationale for selection of these parameters? 9.10b)1) ___ Yes ___ No

   b. Test methods used to test for these parameters? 9.10b)2) ___ Yes ___ No

Site Name: Coffax
I.D. Number: 4616

c. Sampling method used to obtain a representative sample? 9.10b)3) ___ Yes ___ No

d. Frequency with which the initial analysis will be reviewed or repeated? 9.10b)4) ___ Yes ___ No
   1. If yes, does it include requirements to re-test when the process or operation generating the waste has changed? ___ Yes ___ No

e. (For off-site facilities) Waste analyses that generators have agreed to supply? 9.10b)6) ___ Yes ___ No

f. (For off-site facilities) Procedures which are used to inspect and analyze each shipment of hazardous waste received at the facility, including: 9.10c)
   1. Procedures to be used to determine the identity of each movement of waste? ___ Yes ___ No
   2. Sampling method to be used to obtain representative sample of the waste to be identified? ___ Yes ___ No

8. Does the facility provide adequate security to minimize the possibility for the unauthorized entry of persons or livestock onto the active portions of the facility? (265.14 - Security) 23.8 ___ Yes ___ No

If no, describe the situation at the facility, document the facility's exempt under 265.14 a. (1) and (2).

If not exempt, is security provided through:

a. 24-hour surveillance system which continuously monitors and controls entry onto the active portion? (e.g. television monitoring or guards). 23.8b)1) ___ Yes ___ No

OR

b. 1. Artificial or natural barrier completely surrounding the active portion? (e.g. fence or fence and cliff)? ___Yes ___ No

Describe type of security

_____

AND

2. Means to control entry at all times, through the gates or other entrances to the active portion (attendant, television monitors, locked entrance, controlled roadway access)? ___ Yes ___No

Describe type of security.

_____

Include a drawing indicating any inadequacies in the facility's security system.

Site Name: COFAX
I.D. Number: 4616

c. Is a sign with the legend, "Danger-Unauthorized Personnel Keep Out," posted at the entrance and at other locations in sufficient numbers to be seen from any approach to the active portion? (265.14 - Security) 23.8d) ___ Yes ___ No

Is it written in English and legible from at least 25 feet? ___ Yes ___ No

NOTE: The sign must be written in any other language predominant in the area surrounding the facility (e.g. In New Mexico and Texas areas bordering Mexico, the sign must be in Spanish).

If an existing sign with a legend other than "Danger-Unauthorized Personnel Keep Out," what does that legend say?

General Inspection Requirements

9. a. Does the owner/operator maintain a written inspection schedule? (265.15 - General Inspection Requirements) 23.9 ___ Yes ___ No

If yes, does it contain at least schedules for inspecting the following:

1. Monitoring equipment? (If applicable) 9.5b)1) ___ Yes ___ No
2. Safety and emergency equipment? ___ Yes ___ No
3. Security devices? ___ Yes ___ No
4. Operating and structural equipment (if applicable) ___ Yes ___ No

b. Does the schedule or plan identify the types of problems to be looked for during inspection? 9.5b)3) ___ Yes ___ No

1. Malfunction or deterioration (e.g. inoperative sump pump, leaking fitting, eroding dike, corroded pipes or tanks, etc.) ___ Yes ___ No
2. Operator error ___ Yes ___ No
3. Discharges (e.g. leaks from valves or pipes joint breaks, etc.) ___ Yes ___ No

c. Is the schedule maintained at the facility? 9.5b)2) ___ Yes ___ No

d. Are these inspections conducted? 9.5b)1) ___ Yes ___ No

10. Does the owner/operator have an inspection log? 9.5d) (265.15 - General Inspection Requirements) ___ Yes ___ No

a. If yes, does it include: 9.5d)

1. Date and time of inspection? ___ Yes ___ No
2. Name of inspector? ___ Yes ___ No
3. Notation of observations? ___ Yes ___ No
4. Date and nature of repairs or remedial action? ___ Yes ___ No

Site Name: COFAX
I.D. Number: 4616

b. Are there any malfunctions or other deficiencies noted in the inspection log that remain uncorrected? (Use narrative explanation sheet). 9.5c) ____Yes ____No

c. Are records of the inspection log maintained at the facility for three (3) years? 9.5d) ___ Yes ___ No

Personnel Training 23.10

11. Have facility personnel successfully completed a program of classroom or on-the-job training? 9.8a)1) ____Yes____No

a. Does the training program include instructions in the following:

(1) procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment 9.8a)3) ____Yes____No

(2) key parameters for automatic waste feed cut-off systems 9.8a)3) ____Yes____No

(3) operation of communication or alarm systems 9.8a)3) ____Yes____No

(4) response to fires, explosions and groundwater contamination incidents 9.8a)3) ____Yes____No

(5) shutdown of operations 9.8a)3) ____Yes____No

(6) general hazardous waste management procedures 9.8a)2) ____Yes____No

b. Is the program directed by a person trained in hazardous waste management procedures? 9.8a)2) ____Yes____No

c. Have personnel completed annual training reviews? 9.8c) ____Yes____No

d. Does the owner/operator maintain the following documents:

(1) job title, job description and name of employee for each position at the facility related to hazardous waste management 9.8d) ____Yes____No

(2) written description of the type and amount of both introductory and continuing training 9.8d)3) ____Yes____No

(3) written documentation that the training has been completed by facility personnel 9.8d)4) ____Yes____No

Requirements for Ignitable, Reactive or Incompatible Waste 23.11

12. Does facility handle ignitable or reactive wastes? (265.17 - Ignitable, Reactive, Incompatible Wastes) (Circle appropriate type(s) of waste(s). ____Yes____No

a. If yes, is waste separated and confined from sources of ignition or reaction, (open flames, smoking, cutting and welding, hot surfaces, frictional heat) sparks (static, electrical or mechanical), spontaneous ignition (e.g. from heat producing chemical reactions) and radiant heat? 9.9a) ____Yes____No

Site Name: COLKAT
I.D. Number: 4016

b. Are smoking and open flame confined to specifically designated locations? 9.9a) ____Yes____No

c. Are "No Smoking" signs posted in hazardous areas where ignitable or reactive wastes are handled? 9.9a) ____Yes____No

d. Is waste handled in a manner which generates extreme heat, pressure, violent reaction, toxic fumes or other dangers to human health or the environment? 23.11b) ____Yes____No

Section B - Preparedness and Prevention 23.12

1. Is there evidence of fire, explosion or contamination of the environment? (265.31 - Maintenance and operation of facility) 23.13 ____Yes____No

If yes, use narrative explanations sheet to explain.

2. Is the facility equipped with (265.32 - Required equipment)

   a. Internal communications or alarm system 9.6c)1) ____Yes____No
      1. Is it easily accessible in case of emergency? ____Yes____No

   b. Telephone or two-way radio to call emergency response personnel 9.6c)2) ____Yes____No

   c. Portable fire extinguishers, fire control equipment spill control equipment and decontamination equipment? 9.6c)3) ____Yes____No

      1. Is this equipment tested to assure its proper operation? ____Yes____No

   d. Water of adequate volume for hoses, sprinklers or water spray system 9.6c)4) ____Yes____No

      1. Describe source of water _____

      2. Indicate flow rate and/or pressure and storage capacity, if available. _____

3. Is there sufficient aisle space to allow unobstructed movement of personnel and emergency equipment?(265.35-Required Aisle Space) 9.6f) ____Yes____No

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements with local authorities) 9.6a)1) ____Yes____No

If no, has the owner/operator attempted to make such arrangements? ____Yes____No

Site Name: Colfax
I.D. Number: [illegible]

5. In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements with local authorities) 9.6g)1) ___ Yes ___ No

   If yes, indicate primary authority _____.

   a. Is the fire department a city or volunteer fire department? _____.

6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors and equipment suppliers? 9.6g)1) ___ Yes ___ No

   Are they readily available to the emergency coordinator? (265.37 - Arrangements with local authorities) ___ Yes ___ No

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? ___ Yes ___ No
   If no, has the owner/operator attempted to do this? ___ Yes ___ No
   (265.37 - Arrangements with local authorities) 9.6g)1)

8. If the State, or local authorities decline to enter into the above referenced agreements, has this situation been entered in the operating record? (265.37 - Arrangements with local authorities) 9.6 g)2) ___ Yes ___ No

Section C - Contingency Plan and Emergency Procedures 23.19

1. Does the facility have a contingency plan? 9.7a)1) (265.52 Content of Contingency Plan) ___ Yes ___ No

   a. If yes, does it contain:

      1. actions to be taken in response to emergencies? 9.7b)1) ___ Yes ___ No
      2. description of arrangements with police, fire and hospital officials? 9.7b)3) ___ Yes ___ No
      3. list of names, addresses, phone numbers of persons qualified to act as emergency coordinator? ___ Yes ___ No 9.7b)4)
      4. list, including the location and physical description of all emergency equipment 9.7b)5) ___ Yes ___ No
      5. evacuation plan for facility personnel including signals, primary and alternate routes? 9.7b)6) ___ Yes ___ No

2. Is a copy of the contingency plan maintained at the facility? (265.53 - copies of contingency plan) 9.7c)2) ___ Yes ___ No

3. Has a copy been supplied local police,fire depts., and hospitals? (265.53 - Copies of contingency plan) 9.7c)2) ___ Yes ___ No

4. Has the contingency plan been updated and amended as necessary? 23.23 ___ Yes ___ No

Site Name: CalFAX
I.D. Number: 4616

5. Is the plan a revised SPCC Plan? (265.52 - content of contingency plan) 9.7b)2) ___ Yes ___ No

6. Is there an emergency coordinator on-site or within short driving distance of the plant at all times 9.7e) ___ Yes ___ No

If yes, list primary emergency coordinator: _____

Section D - Manifest System

1. Has facility received hazardous waste from off-site since November 19, 1980? (265.71 - Use of manifest system) ___ Yes ___ No

a. If no, questions 1, 2, 3 and 4 are not applicable.

b. If yes, does the facility retain copies of all manifests for at least three (3) years? ___ Yes ___ No

1. Are the manifests signed and dated and returned to the generator? ___ Yes ___ No

2. Is a signed copy given to the transporter? ___ Yes ___ No

2. Has the facility received any hazardous waste from a rail or water (bulk shipment) transporter since Nov. 19, 1980? (265.71 - Use of manifest system) ___ Yes ___ No

a. If yes, is it accompanied by a shipping paper ___ Yes ___ No

1. Does the owner/operator sign and date the shipping paper and return a copy to the generator? ___ Yes ___ No

2. Is a signed copy given to the transporter? ___ Yes ___ No

3. Has the facility received any shipments of hazardous waste since November 19, 1980, which were inconsistent with the manifest? (265.72 - Manifest discrepancies) ___ Yes ___ No

a. If yes, has he resolved the discrepancy with the generator and transporter within 15 days? ___ Yes ___ No

1. If no, has Regional Administrator been notified in writing? ___ Yes ___ No

4. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? (265.76 - Unmanifested waste report) ___ Yes ___ No

a. If yes, has he submitted an unmanifested waste report to the Regional Administrator within 15 days? ___ Yes ___ No

Section E - Record Keeping and Reporting

1. Does the facility have a written operating record? (265.73 - Operating record) 23.29a) ___ Yes ___ No

a. Is a copy maintained at the facility? 23.29a) ___ Yes ___ No

Site Name: Colfax
I.D. Number: 4616

1. b. Does the record include

1. Description and quantity of each hazardous waste and the methods and dates of its treatment, storage or disposal at the facility 23.29b)1) ___ Yes ___

2. Location and quantity of each hazardous waste at each location 23.29b)2) ___ Yes ___

a. Is this information cross-referenced with specific manifest document numbers, if applicable? ___ Yes ___

3. (for disposal facilities only) Location and quantity of each hazardous waste recorded on a map or diagram of each cell or disposal area? 23.29b)2) ___ Yes ___

4. Record and results of waste analyses 23.29b)3) ___ Yes ___

5. Reports of incidents involving implementation of the contingency plan (if applicable) 23.29b)4) ___ Yes ___

6. Records and results of required inspections 23.29b)5) ___ Yes ___

7. Monitoring, testing of analytical data where required 23.29b)6) ___ Yes ___

8. Closure cost estimates and for disposal facilities, post-closure cost estimates 23.29b)7) ___ Yes ___

2. Has the owner/operator submitted biennial reports as required? ___ Yes ___

Section F - Plans and Reports

1. Have all plans and reports been visually inspected and /or been made available for inspection? (265.74 - Availability, retention and disposition of records) ___ Yes ___

List plans and/or reports not made available for inspection. If reports are accessible and not made available for inspection, explain.

_____

_____

2. Did operator provide inspector with a drawing of the facility? ___ Yes ___ No

a. If yes, please indicate which are hazardous waste facilities on the drawing.

Site Name: ____
I.D. Number: ____

CONTAINERS STORAGE CHECKLIST
(Subpart I - Use and Management of Containers 265.170)

1. Does the facility store hazardous waste in containers?
   ✓ Yes ___ No
   If no, do not complete this form.

2. Are the containers in good condition? (check for leaks, corrosion, bulges, etc.) 23.60, 12.2
   ___ Yes ___ No
   If no, explain in narrative and document with photograph.

3. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container? 23.60 & 12.2
   ___ Yes ___ No

4. Is the waste compatible with the containers and/or its liner? 23.61 & 12.3
   ___ Yes ___ No
   If no, explain in narrative.

5. Are the stored containers closed? 23.62 & 12.4
   ___ Yes ___ No
   If no, explain in narrative.

6. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak? 23.62 & 12.4
   ___ Yes ___ No
   If yes, explain in narrative.

7. Are each of the containers inspected at least weekly? 23.63 & 12.5a)
   ___ Yes ___ No
   If no, explain in the narrative the frequency of inspection.

8. Are containers holding ignitible or reactive wastes located at least 15 meters (50 feet) from the facility property line? 23.63 & 12.7
   ___ Yes ___ No
   If no, explain in narrative and document with photograph.

9. Are incompatible wastes stored in the same containers? 23.65 & 12.8
   ___ Yes ___ No
   If yes, explain in narrative.

10. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance? 23.65 & 12.8
    ___ Yes ___ No
    If no, explain in narrative.

11. Is each container clearly marked with the date accumulation began and the words "Hazardous Waste"? 7.5e)1)
    ___ Yes ___ No

Site Name: COFFAX
I.D. Number: 4616

Subpart J - Tanks (265.190)

NOTE: If multiple tanks exist, list each tank and specify compliance or non-compliance. Complete an individual checklist for each tank not in compliance and a collective checklist for those in compliance.

1. Are there any tanks which are not being used which the facility no longer plans to use? ___ Yes ___ No

   a. If yes, has all hazardous waste and hazardous waste residue been removed from these tanks, discharge control equipment, and discharge confinement structures? ___ Yes ___ No

2. Are tanks presently used to treat or store waste? 23.66 ___ Yes ___ No

   a. If no, do not complete rest of form.
   b. If yes, check tanks.

3. Is there evidence that wastes placed in the tank are incompatible with the tank or liner? 23.67b) ___ Yes ___ No

   NOTE: Any evidence of ruptures, leaks or corrosion. (Use narrative explanations sheet.)

4. Are there any uncovered tanks? 23.67c) ___ Yes ___ No

   a. If no, do not complete 4b.-e.
   b. If yes, do they have 2 feet (60cm) freeboard? ___ Yes ___ No
      or
   c. A containment structure? (e.g. dike or trench) or ___ Yes ___ No
   d. A drainage control system? ___ Yes ___ No
      or
   e. A diversion structure? (e.g. standby tank) ___ Yes ___ No

   (NOTE: The structure in c, d or e must have a capacity that equals or exceeds the volume of the top 2 feet (60 cm) of the tank.)

If the answers to 4b.-e. are "no", explain current conditions using narrative sheets.

5. Are any of the tanks continuous feed? 23.67d) ___ Yes ___ No

   a. If yes, is it equipped with a means to stop inflow (e.g. waste feed cutoff or by-pass to a stand-by tank)? ___ Yes ___ No

Site Name: Colfax
I.D. Number: 4616

Waste Analysis and Trial Tests

6. a. Has the tank been used to treat or store a hazardous waste substantially different from the waste previously treated or stored in the tank? 23.68a

OR

b. Has a chemical treatment process been used in the tank which was substanti different than any previously used in the tank? 23.68a) _____Yes_____

a. or b. is yes,

1. Were waste analyses and trial treatment or storage tests conducted prior t the change? 23.68b)

OR

2. Was written, documented information obtained on similar storage or treatme of similar wastes under similar conditions?

_____Yes_____

Inspections

_____Yes_____

7. Does the owner/operator inspect the following at least daily, where present? 23.70

___ Yes ___

(Indicate which items are present in 7 and 8.)

a. Discharge control equipment (e.g. waste feed cut-off, by pass and/or drainage systems)? 23.70a)1)

23.70a)2) b. Monitoring equipment (e.g. pressure and temperature gages)? ___ Yes ___

c. Level of waste in each uncovered tank? 23.70a)3) ___ Yes ___

___ Yes ___

8. Does the owner/operator inspect the following at least weekly? ___ Yes ___

a. Construction materials of tanks for corrosion or leaks? 23.70a)4) ___ Yes ___

b. Construction materials of and area surrounding discharge confinement structures for erosion or signs of leakage? 23.70a)5) ___ Yes ___

9. What is the procedure for assessing the condition of the tank?

Explain in narrative. (e.g. How does the procedure allow for detection of cracks, leaks or corrosion or procedures for emptying the tank to allow entrance, etc.)

Site Name: Coltec
I.D. Number: [illegible]

10. Are ignitable or reactive wastes placed in tanks? 23.72 11.4 ___ Yes ___

a. If yes, are they treated, rendered or mixed before or immediately after placement in the tank so it no longer meets the definition of ignitable or reactive? ___ Yes ___

OR

b. Is the waste protected from sources of ignition or reaction? ___ Yes ___

1. If yes, use narrative explanations sheet to describe separation and confinement procedures.

2. If no, use narrative explanations sheet to describe sources of ignition or reaction

OR

c. Is the tank used solely for emergencies? ___ Yes ___ N

11. Has the facility ever placed incompatible wastes in the tank? 23.73 & 11.5a) ___ Yes ___ N

a. If yes, what were the results. (Use narrative explanations sheet). (Look for signs of mixing of incompatible wastes, e.g. fire, toxic mist, heat generation, bulging containers, etc.)

12. If a waste is to be placed in a tank that previously held an incompatible waste, was that tank washed? 11.5b) ___ Yes ___ No

a. If yes, describe washing procedures (Use narrative explanation sheet.)

Describe how it is possible for incompatible wastes to be placed in the same tank. (Use narrative explanations sheet.)

13. Are the tanks all addressed in a closure plan? 23.71 ____Yes____No

Site name: Coffax
I.D. Number: [illegible]

SURFACE IMPOUNDMENTS CHECKLIST
Subpart K - Surface Impoundments 265.220

NOTE: Check all surface impoundments. Fill out one checklist for any impoundment in violation. Fill out one checklist for all other impoundments in compliance. Indicate number of surface impoundments at the facility.

1. Are there any surface impoundments which are not being used which the facility does not plan to use in the future? ___ Yes ___ No

   a. If yes, has all hazardous waste and hazardous waste residue been removed from the impoundment? 23.79 ___ Yes ___ No

2. Are impoundments presently used to treat or store waste? ___ Yes ___ No

3. Does the impoundment appear to maintain at least 2 feet (60 cm) of freeboard? 23.75 ___ Yes ___ No

   a. If no, what was the freeboard? _____

4. Is there evidence of overtopping of the dike? 23.75 ___ Yes ___ No

   If yes, please describe. _____

5. Do earthen dikes have a protective cover to minimize wind and water erosion? 23.76 ___ Yes ___ No

   Provide description of containment. _____

6. What wastes are treated or stored in the impoundment? (Use narrative explanations sheet).

7. Are hazardous wastes chemically treated in the impoundment which are substantially different from wastes previously treated or using different treatment methods than previously used? ___ Yes ___ No

   a. If yes, are

      1. Waste analyses and trial tests conducted on these wastes? 23.77b)1) ___ Yes ___ No

      OR

      2. Does the owner/operator have written documented information on similar treatment of similar wastes under similar operating conditions? 23.77b)2) ___ Yes ___ No

   b. Is this information retained in the operating record? 23.77c) ___ Yes ___ No

8. Is the impoundment inspected daily to check freeboard level? 23.78a) ___ Yes ___ No

9. Is the impoundment, dike and vegetation surrounding the dike inspected to detect leaks, deterioration or failures at least once a week? 23.78b)
___ Yes ___ No

10. Are ignitable or reactive wastes placed in the impoundment? 23.80 ___ Yes ___ No

a. If no, do not complete b and c.
b. If yes, are they treated, rendered or mixed before or immediately after placement in the impoundment so it no longer meets the definition of ignitable or reactive? 23.80a)1)
___ Yes ___ No

OR

c. Is the impoundment used solely for emergencies? 23.80a)2) ___ Yes ___ No

1. If yes, has further treatment, storage or disposal been conducted on these wastes? Describe this situation.

_____

_____

11. Has the facility ever placed incompatible wastes in the impoundment? 23.81
___ Yes ___ No

a. If yes, what were the results. (Use narrative explanation sheet.) (Look for signs of mixing of incompatible wastes e.g., fire, toxic mist, heat generation, bulging containers, etc.)

12. What is the impoundment lined with? _____

Effective May 1985

13. Is the impoundment a new unit, replacement of an existing unit or lateral expansion of an existing unit?
___ Yes ___ No

If yes,

a. Has waste been received since May 1985?
___ Yes ___ No

If yes,

1. Has the owner/operator notified the Regional Administrator (or state authority) at least 60 days prior to receiving the waste?
___ Yes ___ No

2. Has the owner/operator filed an application for a final determination regarding the issuance of the permit within 6 months of the notice to receive wastes?
___ Yes ___ No

Colfax
4616

3. Is the impoundment completed with two or more liners and a leachate collection system between such liners?

___ Yes ___ No

4. Does the impoundment have a groundwater monitoring system in place?

___ Yes ___ No

closed

Site Name: Colfax
I.D. Number: 4616

Post-Closure

Note: Complete for disposal facilities only

A. Does the facility have a post-closure plan? If, yes complete the following checklist. Yes ✓ No ___

1. Does the plan include:
   a. A description of planned groundwater monitoring activities and frequencies? Yes ✓ No ___
   b. A description of planned maintenance activities and frequencies to ensure the following:
      1. Integrity of cap, final cover or other containment Yes ✓ No ___
      2. Proper function of groundwater monitoring equipment Yes ✓ No ___
   C. Name, address and phone number of facility contact for the post-closure period Yes ✓ No ___
2. Has the plan been amended, during the operating life of the facility, to reflect changes in operation or design? Being Amended 4/88 Yes ✓ No ___
3. Using narrative explanations sheets, give a summary of planned post-closure activities; or attach a copy of the post-closure plan. Copy on File
4. Does the post-closure plan address all hazardous waste disposal areas? Yes ✓ No ___
5. Are post-closure cost estimates available and modified as necessary. Give latest cost estimate and date of adjustment. ~~$ [illegible]~~ Amended date & cost
6. Has a notation been made on the deed to the property to show that the land has been used to manage hazardous wastes and that further use must not disturb the integrity of post-closure maintenance? Dec. 1, 1986 Yes ✓ No ___

$ 16080
7/16/87

7. Have closure activities begun at the facility Yes ✓ No ___
   a. If yes, was the post-closure plan submitted to the Reg. Administrator at least 180 days before closure activities began? Yes ✓ No ___

Post Closure plan being revised To show new costs regarding G.W. Monitoring & Recovery System.

Site Name: Co/Fax
I.D. Number: 4616

8. Was a survey plat submitted to the local land authority and to the Regional Administrator within 90 days after closure was completed? Dec. 1, 1986 Yes ✓ No ___

9. Have post-closure activities begun at the facilty? If yes,

   a. Do these activities correspond to planned activities written in the post-closure plan? Yes ✓ No ___

   b. Have changes in monitoring or maintenance events during the post-closure period necessitated changes in the plan? Yes ✓ No ___ Report being Amended

      1. Was a petition filed with the Regional Administrator within 60 days of the changes? Yes ___ No N/A

      2. Has the facility received written response from the Reg. Administrator? Yes N/A No ___

Site Name: Colfax
I.D. Number: 4614

GROUND WATER MONITORING CHECKLIST

1. GROUND WATER MONITORING STATUS:

Complete the table for each Waste Management Area (WMA):

WMA	Description of Units in WMA	Activity Status	Monitoring Status	Number of Wells
1	1 Acre Pond	Closed	Post closure	U 4 D
2	SMALL Pond #1	"	Recovery	U D
3	" " #2	"		U D
4				U D

Total of MW's @ Facility 5

a. Provide diagram showing locations of each monitoring well around each unit and indicate date of installation of each well. In File

2. Has the following been installed in the uppermost aquifer around each Waste Management Unit:

a. At least one hydraulically upgradient well? Yes ✓ No ___
b. At least three hydraulically downgradient wells? Yes ✓ No ___
c. If you answer no to either a or b above, explain in comments.

3. Does the facility have a GW Sampling and Analysis Plan? Yes ✓ No ___
If yes, Does it adequately address:

a. Sample collection procedures Yes ✓ No ___
b. Sample preservation and shipment Yes ✓ No ___
c. Analytical procedures Yes ✓ No ___
d. Chain of Custody procedures Yes ✓ No ___
e. QA/QC Procedures Yes ✓ No ___

4. Does the facility have GW Quality Assessment Plan Outline? Yes ✓ No ___

5. Has the facility been granted an alternate groundwater monitoring plan or partial waiver? Yes ___ No ✓

a. If yes, is an approved sampling and analysis plan followed? Yes ___ No N/A

b. If yes, give date of approval ~~[illegible] 88~~ VFM

mw-1- upgradient
mw-2, mw-3, P-4, mw-4 - Post closure wells
P-1 - Recovery well
P-2 + P-3 + mw3 - Monitors P-1 Progress

REVISED 10/86

6. Does the facility keep records of the following:

a. Analyses for ground water parameters? Yes ✓ No ___
b. Calculations of means and variances? Yes ✓ No ___
c. Water surface elevations taken at each well sampling event? Yes ✓ No ___
d. Total well depth and water elevation taken at each well sampling event? Yes ✓ No ___
e. Analyses of duplicate samples for contamination confirmation? Yes ✓ No ___
f. Analyses of samples taken as a result of implementing the Ground Water Quality Assessment Plan? Yes ✓ No ___
g. Results of Ground Water Quality Assessment Plan? Yes ✓ No ___
   (1). Rates of Migration? 55-60 FT Deep Yes ✓ No ___
   (2). Concentration of hazardous waste and/or constituents thereof? Yes ✓ No ___
   (3). Analyses of quarterly ground water Yes ✓ No ___
h. Copies of annual reports of the groundwater monitoring program? Yes ✓ No ___

7. Complete the remaining checklists as applicable to each Waste Management Area. Indicate which checklists are completed.

✓ First Year Background Sampling
✓ Semi-Annual Detection Monitoring
✓ GW Assessment Monitoring

8. Are monitoring wells cased in a manner that maintains the integrity of the monitoring well bore hole? Yes ✓ No ___

Describe the well casing.

AREAL EXTENT not denoted in revised Report but noted in Jan. 5, 1984 Response TO 10/7/83 C.O. - RATE OF Migration 10 Feet per year

Site name: Co/Pax
I.D. Number: 4414

FIRST YEAR BACKGROUND SAMPLING

(Complete only for those facilities presently doing background sampling)

Waste Management Area(s)_____

1. Are all samples analyzed for:

EPA Drinking Water Standards?	Yes ✓	No ___
Ground water quality parameters?	Yes ✓	No ___
Contamination indicator parameters?	Yes ✓	No ___

2. Are 4 replicate measurements of contamination indicator parameters made for each well sample? Yes ✓ No ___

3. Are ground water surface elevations determined at each well sampling event? Yes ✓ No ___

4. Briefly explain <u>why</u> facility is performing first year sampling at this time:

[redacted]

Site Name: Coastal
I.D. Number: 4614

GW SEMI-ANNUAL DETECTION MONITORING

(To be completed for those facilities that have completed the first year of background sampling)

Waste Management Area(s)_____

1. Was the first year background sampling program adequately completed? Yes ✓ No___

2. Are wells sampled and analyzed annually for ground water quality parameters? Yes ✓ No___

3. a. Are wells sampled and analyzed semi-annually for contamination indicator parameters? Yes ✓ No___
   b. Are 4 replicate measurements of indicator parameters made for each upgradient and downgradient well sample? Yes ✓ No___

4. Are ground water surface elevations determined at each well for each sampling event? Yes ✓ No___

5. Were ground water surface elevations evaluated annually to determine whether monitoring wells are properly placed? Yes ✓ No___

   a. If yes, explain procedure_____

6. Are statistical comparisons, using the Student's t-test at the 0.01 level of significance, performed? .05 FOR Penta Yes___ No ✓

   a. If no, explain

7. Have significant increases (or pH decreases) in contamination indicator parameters been found in the:

   a. Upgradient wells? MW 1 Yes ✓ No___ Unknown
   b. Downgradient wells? MW 2 Yes ✓ No___
      MW 3
      MW 4 - [redacted]

Site Name: COLFAX
I.D. Number: 4614

8. If significant increases (or pH decreases) in downgradient wells were detected, did the company:

   a. Resample the "affected well(s), split the sample in two, and re-analyze for the parameter(s) that showed significant difference? Yes ✓ No ___
   b. Confirm the significant difference? Yes ✓ No ___
   c. Notify the Regional Administrator within 7 days of confirmation? Yes ✓ No ___
   d. Submit a certified Ground Water Quality Assessment Plan within 15 days of notifying the Regional Administrator? Yes ✓ No ___

9. Has the facility substituted other indicator parameters in place of pH, conductivity, TOC and/or TOX? Yes ✓ No ___

   b. List the parameters: Specific Cond., TOC, TOX
   c. Date of approval ___

Comments: Sampled 6/12/86 Calculated 2/27/87 & notified Dept. 2/22/87

Site Name: [redacted]
I.D. Number: 4614

GW ASSESSMENT MONITORING

(To be completed for those facilities that have entered Assessment Phase of monitoring)

Waste Management Area(s) ~~2 SLF~~ WMU

1. Has the facility started to implement an approved Ground Water Quality Assessment Plan? ~~Approved March~~ 1987 Yes ✓ No ___
   Give date plan was started ~~April 1987~~ 3/85 WMU
2. If the plan is in progress, give projected completion date 30 YRS and describe actions to date: _____
   a. Is the facility on schedule? Yes ✓ No ___
3. If the plan has been completed, give date of Ground Water Quality Assessment report: NOV. 1986
4. Do results indicate that hazardous waste or constituents have been detected? Yes ✓ WMU No ___ WMU
   a. If yes, has an Assessment Monitoring Program been implemented? Yes ✓ No ___
   b. If no, was detection monitoring reinstated? Yes N/A No ___
   c. If the facility has not responded appropriately, explain why in comments. Corrective Action Implemented
   Note: If answer to 4b is yes, Stop Here.
5. List the hazardous waste constituents detected: K001 Constituents
6. Has the facility Sampling and Analysis Plan been revised to include these parameters? Revised NOV. 1986 Yes ✓ No ___
7. Quarterly, since completion of the assessment, has the facility continued to:
   a. Sample and analyze for hazardous waste or contituents? Yes ✓ No ___
   b. Determine rate and extent of migration of hazardous waste or constituents?, 97 Acre Yes ✓ No ___

DIAGRAM Shows AREA OF Contamination with a depth TO 50-60 Feet.

Site Name: [illegible]
I.D. Number: 46[illegible]

8. Yearly, has the facility reported the results of the assessment program (with annual waste report), to include the calculated (or measured) flow rate in ground water during the reporting period? 2/29/88 Yes ✓ No ___

9. Has the assessment detected hazardous waste or constituents in ground water at this regulated unit? Yes ✓ No ___

a. If yes has the facility sampled and analyzed for all hazardous waste constituents (Appendix VIII, 40 CFR 261) to characterize the plume in accordance with with 40 CFR270.14(c) (4)? Yes ✓ No ___

Comments: _____